

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**CHRIS MOISE, ISH ADERONMU and PRABHA KHOSLA on her own behalf
and on behalf of all members of WOMEN WIN TO**

Applicants

- and -

**ATTORNEY GENERAL OF ONTARIO and
THE CORPORATION OF THE CITY OF TORONTO**

Respondents

APPLICATION under Rule 14.05(3)(g.1) of the *Rules of Civil Procedure*, RRO 1990,
Reg 194

APPLICATION RECORD – VOLUME II OF II

August 22, 2018

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ACKNOWLEDGEMENT OF EXPERT'S DUTY

1. My name is Myer Siemiatycki. I live at Toronto, in the Province of Ontario.
2. I have been engaged by or on behalf of the Applicants 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 on whose behalf I am engaged.

Date: 21 August 2018


Myer Siemiatycki

TAB 8

Court File No.: CV-18-00603633-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**CHRIS MOISE and ISH ADERONMU and PRABHA KHOSLA on her own behalf and
on behalf of all members of Women Win Toronto**

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- and -

ATTORNEY GENERAL OF ONTARIO

Respondent

APPLICATION under Rule 14.05(3)(g.1) of the *Rules of Civil Procedure*, RRO 1990, Reg 194

**AFFIDAVIT OF MARIANA VALVERDE
(Sworn August 20, 2018)**

I, Mariana Valverde, of the City of Toronto, MAKE OATH AND SAY:

1. I am a resident of the City of Toronto, and a Professor at the Centre for Criminology and Sociolegal Studies at the University of Toronto. One of my primary areas of research is urban governance and law. In the early 2000s, I spent five years engaged in direct ethnographic research on governance in the City of Toronto, participating in council hearings and civic association meetings, and shadowing housing inspectors and law enforcement officials as they went about their day-to-day work. I published the results of that research in a book entitled *Everyday Law on the Street: City Governance in an Age of Diversity*, which won the Herbert Jacob Book Prize from the Law and Society Association.

2. I am currently engaged in two research project related to city governance, one that examines public-private infrastructure partnerships, especially in Ontario, including the

Toronto Sidewalk Labs proposed “smart city” project; and a second longer-term historical research project on how, during the “century of the suburb” (1870-1970), public and private authorities worked to shore up the moral-economic-racial lines dividing “good” from “bad” neighbourhoods, and how these efforts were undermined by economic changes.

3. I have also long been involved in both scholarly research and activism in relation the regulation of sexuality. I have been involved in LGBTQ politics in the City of Toronto since the 1970s, including as a member of the collective that wrote and published *The Body Politic*, the forerunner to *Xtra* magazine. I have previously been qualified as an expert witness in cases concerning the rights of LGBTQ individuals, couples and families. A copy of my *curriculum vitae* is attached as “**Exhibit A**” to my affidavit.

4. The evidence I provide in this affidavit is my opinion based on my scholarly research and expertise. I understand and acknowledge my duty to the court to provide fair, objective and non-partisan evidence.

5. In order to explain the impact of reducing the number of councillors and wards from 47 to 25 mere months before the municipal election is scheduled to take place, it is necessary first to review the functions of municipal government in general, and the particular form municipal government takes in the City of Toronto.

(a) Functions of Municipal Government

6. Scholars of municipal governance emphasize that local governments do not simply have different powers than other levels of government: they do different things, and do them

in a different manner.¹

7. Functions and services that are typically municipal include constructing and maintaining infrastructure, such as streets and sidewalks, lighting, potable water and sewers; providing waste collection and management, often including recycling and composting as well as disposal; snow removal; and regulating traffic and parking. Municipal governments also regulate land use and building construction through official plans, zoning by-laws, and building codes and inspections. Through municipal licences and permits, local governments regulate businesses, maintain public order, and manage various forms of conflict.

8. Local governments, meaning both municipal public servants and elected officials, are today expected to manage a range of concerns and problems that were historically addressed primarily through a combination of nuisance lawsuits and public nuisance bylaws.² It is municipal governments that citizens turn to when confronted with problems such as offensive noises, improper disposal of trash, unsafe road and street conditions, and issues related to traffic, including traffic safety, and parking (on both private and public properties).

9. Municipal governments provide services such as public health and firefighting. In medium-sized and large cities, policing is generally also a local function. Not only is the regular police budget usually funded by the municipality, but residents hold city councillors

¹ See e.g. Ash Amin and Nigel Thrift, *Seeing Like a City* (Cambridge: Polity, 2016).

² For an extended discussion of how nuisance lawsuits and public nuisance laws have evolved over time, in the context of an increased preference for objective rules, numerical if possible, see my extended discussion in Mariana Valverde, "Seeing Like a City: The Dialectic of Modern and Premodern Ways of Seeing in Urban Governance" 45:2 *Law and Society Review* (2011). See also Beth Bilson, *The Canadian Law of Nuisance* (Toronto: Butterworths, 1991). I have also discussed business licensing, a power that municipalities use to maintain public order and also to manage intra-citizen and inter-occupational conflicts, in several publications.

and the mayor largely or at least partially accountable for police actions, including claims of racial profiling.

10. In addition, residents of municipalities have come to expect 'the city' to provide a range of other facilities, services and amenities, such as libraries (which provide all manner of services besides lending books), public transportation, parks, playing fields, recreation facilities, and programs for children and youth. The benefits of providing these programs and services and making these facilities available free of charge or at affordable rates extend far beyond their immediate users.

11. For example, criminologists would generally concur that cities that provide a good range of programs for children and youth are not only contributing to crime prevention in a direct manner, but are also countering the economic and social forces that are today increasing inequality and spatial segregation (with this increase in inequality being visible around the world, not just in Toronto). When a city provides low-cost educational, recreational and sports opportunities for youth, that is not only a direct service to those who attend but is also a message about citizenship, a message that 'the city' belongs to all, including low-income tenants, racialized newcomers, and other marginalized groups.³

12. The same applies to public libraries and also to public transit. Transit is not free in any city in Ontario; but transit is now free for children in Toronto, and is free to university students (or is included in their university fee) in many cities across Canada including some in

³ On the relationship between municipal recreation facilities and services and crime prevention, urban safety, and inclusion see Bruce Kidd & Jim Phillips, eds, *From enforcement and prevention to civic engagement: research on community safety* (Toronto: Centre of Criminology, University of Toronto, 2004).

Ontario. Similarly, despite its fiscal constraints, the City of Toronto has, like other cities in Canada, taken responsibility for housing a large part of the homeless population, through the municipal shelter program; and it has taken some responsibility for childcare and childcare subsidies. Like recreation programs, free public libraries, affordable or free transit, emergency shelter and subsidized childcare all serve both practical functions and also a less tangible but no less significant function concerning belonging, civic justice, and equality.

13. As countless urban studies scholars – going back to the venerable German classical sociologist Max Weber – have shown,⁴ cities are not merely micro-states but distinct social, economic, cultural and political organisms, and local government is qualitatively distinct from government at other levels.

(b) The Structure of Municipal Government

14. Unlike the provincial and federal governments, municipal governments do not have ministries or ministers. While council does have an Executive Committee, its role is far more limited than that of cabinet.⁵ City staff can and do enforce by-laws and deliver services, in Toronto as in other cities inside and outside Canada, but only council can set policy and

⁴ See Saskia Sassen, *The Global City: New York, London, Tokyo* (Princeton, NJ: Princeton University, 1991); Gerald Frug, *City Making: building communities without building walls* (Princeton, NJ: Princeton University, 1990); Engin Isin, *Being Political: genealogies of citizenship* (Minneapolis: University of Minnesota, 2002); Peter Hall, *Cities of Tomorrow: an intellectual history of urban planning and design since 1880*, 4th ed. (Hoboken, NJ: Wiley-Blackwell, 2014); John Lorinc, *The New City: how the crisis of Canada's cities is reshaping our nation* (Toronto: Penguin Canada 2006); Michael Peter Smith, *Transnational Urbanism: locating globalization* (Malden: Blackwell, 2001); Max Weber, *The City*, Don Martindale & Gertrud Neuwirth, eds and trans (New York: Free Press, 1966).

⁵ The Executive Committee “makes recommendations on Council's strategic policy and priorities, governance policy and structure, financial planning and budgeting, fiscal policy including revenue and tax policies, intergovernmental and international relations, Council and its operations, and human resources and labour relations.”

decide how much money to spend on which function. Councillors vote on virtually every aspect of city governance, from matters of city-wide importance, such as the budget, to exceedingly local matters, such as minor variances from the official plan.

15. There is thus a very different relationship between what might be described as the legislative and the executive branches at the municipal level than exists at the provincial or federal level. At the municipal level, governance is achieved far more through the legislative branch – that is, city council – than at other levels of government. Provincially and federally, much of the work of governance depends on the subject matter expertise of ministries. Municipally, as discussed in detail below, the work of governance is far more dependent on the local knowledge and community expertise of councillors. Councillors are the key actors in local government.

16. In addition, the nature of core municipal functions and the services that larger cities such as Toronto have developed and their citizens have come to expect, demands a certain closeness between residents and their local government. Many if not most areas of federal and provincial jurisdiction exist at a different temporal and spatial scale than those that fall within the purview of municipal government. With some exceptions, they generally do not affect the day-to-day lives of local residents at the local scale and in immediate ways. An MP who is called upon to vote on an immigration or tax law measure might well seek constituents' views, but must consider the matter with a view to its national implications as well as local feeling. Similarly, while provincial MPP's have constituency offices and do both seek out and respond to electors' complaints and suggestions, their focus is also broader than the needs and interests of the communities they represent directly.

17. In addition, political parties play a key role in provincial and federal elections. While electors may be moved to vote for – or against – a specific, individual candidate, they frequently and arguably more often use their vote to endorse a party or platform. In other words, voters in federal and provincial elections may well cast their vote for whatever candidate is nominated by the party or platform they support.

18. The structure of some municipal governments outside of Ontario bears a closer resemblance to these aspects of provincial and federal politics. In Vancouver, for example, municipal councillors are elected on a city-wide basis. This means both that councillors represent the interests of the city as a whole – not just those within a particular geographic area – and that political parties, or at least slates of candidates running on a common platform, play a much more significant role.

19. In Toronto and other municipalities in Ontario, in contrast, councillors are elected to represent geographically defined wards. Thus, relative to both federal and provincial governments and to the governments of other cities, municipal government in Toronto is highly localized and highly individualized.

20. Councillors are expected to be responsive to the needs and interests of their constituents. In order to do so effectively, as set out in detail below, they require local and indeed hyper-local knowledge of the neighbourhoods and communities they represent. In addition, although some candidates may be identified as tending more to one or the other end of the political spectrum, electors cannot rely on party membership as the basis for their support. The decision who to vote for, or whether to vote at all, is therefore much more likely to be made on the basis of specific knowledge and experience of a given candidate.

Successful candidates for election – especially those who successfully challenge incumbents – will generally have spent months if not years developing and demonstrating local knowledge and experience, attending community events and engaging in various ways with individual community members, businesses, parents’ groups, neighbourhood associations, and other organizations within the communities they seek to serve.

21. Given the structure of city council, the closeness that is the hallmark of municipal politics generally is particularly pronounced in Toronto. Local government in Toronto is profoundly shaped by the direct, day-to-day interactions through which candidates and constituents come to know one another.

22. As previously mentioned, the kinds of concerns and problems that councillors have long been expected to address require local knowledge and local experience. Indeed, at city council meetings, councillors unfamiliar with a particular area will usually defer to the local councillor when a matter comes up (say, a new cycling lane). That may not be ideal from the point of view of normative political theory, but it is the only way in which a ward-based system can work in a municipality with a very large population occupying a large and diverse geographic area.

23. In a large city especially, local and indeed micro-local knowledge is crucial if council is to make informed decisions on the countless matters that may appear minor to outsiders but that matter a great deal to those involved (say, a new traffic light, or an improvement plan for a particular park). Local knowledge is essential for councillors to represent the diverse interests and meet the sometimes conflicting needs of their constituents. Councillors play a key role in identifying what is required in their constituencies, in implementing city initiatives

in locally sensitive and effective ways, in advocating for programs and services, and in brokering relationships with both council and a range of other actors.

24. It is by now well-recognized that there is marked and growing inequality in the city.⁶ Increased awareness of income and other forms of inequality within Toronto has been met with a growing willingness to provide city-funded programs and services in a differentiated manner – and thus a growing role for councillors in seeking access for their constituents consistent with the needs of their neighbourhoods and communities.

25. To return to the example of Parks and Recreation, there are some areas of the city in which fees are charged for programming in community recreation centres, and others in which programming is offered free of charge. Councillors play a significant role in both advocating for their wards, or neighbourhoods within their wards, to benefit from these initiatives, and in translating a general approach favouring equitable access to recreational programming into locally tailored and appropriate solutions.

26. Councillors serve as the interface between community groups and local recreation centres to determine how the needs of community members can best be met. For example, the Regent Park Aquatic Centre offers women-only hours, and has blinds that can be lowered to block the pool and pool deck from public view. These measures help to ensure equitable access for women who are members of the sizeable Muslim community within the Regent Park neighbourhood, and were achieved in part through the local knowledge and advocacy

⁶ See eg Susan MacDonnell, Don Embuldeniya, & Fawzia Ratanshi, *Poverty by Postal Code: The Geography of Neighbourhood Poverty City of Toronto, 1981-2001* (Toronto: United Way of Greater Toronto and the Canadian Council on Social Development, 2005); David Hulchanski, *The Three Cities Within Toronto: Income Polarization Among Toronto's Neighbourhoods, 1970-2005* (Toronto: Cities Centre, University of Toronto, 2010).

efforts of late city councillor Pam McConnell. Similarly, councillors whose wards include neighbourhoods with significant South Asian populations have advocated for cricket pitches to be built in place of or in addition to baseball diamonds, consistent with the recreational needs and interests of their constituents. Councillors also sit on the boards of ten city-run community centres, which offer a range of other programs and services. Again, city councillors' local knowledge and expertise helps to ensure that these programs and services best meet the needs of the communities they serve.

27. Individual councillors play a key role not only in shaping city services to meet the needs of their constituents but also in advocating for additional city services to be provided. The availability of safe injection sites, and of additional emergency shelters in Toronto during particularly harsh weather conditions this past winter, was largely the result of individual councillors – informed and supported by community members and activists – identifying needs in their communities and advocating for city resources to be made available to meet those needs.

28. Councillors thus broker the relationship between their constituents and city council, and also work within their constituencies to mediate conflicting interests and address diverse and sometimes divergent needs.

29. Councillors play a similar role in relation to services and facilities that are provided by non-City actors. For example, many of the shelter services available in Toronto are provided by community agencies. Councillors will often spearhead consultation with the broader community – for example, by convening public meetings – and establish community liaison committees to manage conflicts between existing and shelter residents. In addition, section 37

of the *Planning Act* authorizes municipalities to grant increases in height or density of development, in exchange for the provision of “facilities, services or matters”. Councillors both seek and channel community input on what facilities, services or other benefits are the highest priority for their constituents. As noted in a review of section 37 commissioned by the City, the councillor’s recommendations are usually based on his or her knowledge of the community needs in the area and requests from constituents as well as inputs from City staff.⁷

30. The provision of services by and in the city is thus significantly determined by individual councillors representing local interests, and the question whether the interests of specific communities will be represented in the day-to-day work of city government is profoundly dependent on the local knowledge of those individuals.

31. If local government in medium-sized and large cities in Ontario fundamentally empowers and depends on councillors, and those councillors are and will continue to be elected not through the party system used at other levels of government but rather through the geographic category of the ward, then it is imperative that councillors be as knowledgeable of and responsive to their local constituents as possible.

32. It is also essential that councillors be representative of the communities they serve, and at the aggregate level of the city more broadly. I believe that urban studies scholars would be quite unanimous that council ought to embody the demographics of the city, rather than merely talk about diversity. It is of course important for all levels of government to be diverse, in an officially multicultural country; but at the local level, where residents are very likely to interact in person with councillors and/or their staff, on issues that deeply affect the

⁷ Gladki Planning Associates, “Section 37 Review Final Report: City of Toronto” (January 2014) at p 8.

everyday lives of people who might not follow political news, demographics are particularly important – both for the functioning of democracy itself and as a message to minority groups that the city is indeed open and diverse. **238**

33. The highly localized and individualized nature of Toronto municipal elections creates specific challenges to achieving that goal. Relative to many other municipalities, Toronto is significantly less racially segregated. While specific neighbourhoods may be identified with particular racialized or ethnocultural communities, wards are not. In other words, although some of both the previous 47 and the proposed 25 wards have a higher population of visible minority residents than others, those residents are generally drawn from diverse communities. This is undoubtedly very positive for the day-to-day life of the city and its residents, but also means that the votes of those communities are geographically diffuse. This is in contrast to a city like Vancouver, where communities can campaign and vote for representative councillors on a city-wide basis. In addition, where elections are city-wide and political parties play a more significant role, the parties can also foster representative government by running diverse slates of candidates. This form of collective or coordinated action is equally unavailable in Toronto.

34. This is not to say, however, that diverse communities in Toronto do not have a spatialized presence, or have not found creative and strategic ways to achieve representation on city council despite the ward system.

35. Councillors may well represent communities of interest that are identified with particular locations even if they are not – or are not any longer – majorities or significant minorities within the population of a given ward. Toronto is often described as a “city of

neighbourhoods”, and many of those neighbourhoods have a particular ethnic or other community character that persists despite shifting demographics. For example, the area known as “Little India” or the “Gerrard Street Bazaar” remains highly significant to members of Toronto’s South Asian community notwithstanding that the South Asian proportion of the local population has declined over the past number of years. Similarly, while the majority of LGBTQ persons in Toronto live outside of the downtown core, the Church/Wellesley neighbourhood is a highly significant location for that community. Street fairs and other events that celebrate particular communities – for example, the annual Roncesvalles Polish Festival – continue to be held in the neighbourhoods with which they were historically associated even if that association is now attenuated when viewed solely from a demographic perspective. Councillors play an important role in coordinating those festivals with the city.

36. It is not a coincidence that current councillor Kristyn Wong-Tam, whose ward includes the Church/Wellesley neighbourhood, is the only openly lesbian member of council; it is not a coincidence that current councillor Mary Fragedakis represents the Danforth; that councillor Ana Bailão’s ward includes Little Portugal, and so on. It is not that their wards are overwhelmingly populated by LGBTQ, Greek, or Portuguese electors, respectively, so much as that they are strongly identified with those communities – and members of those communities commit time and resources to electing councillors who they believe will represent their interests.

37. History demonstrates the significance a councillor can have in representing and advancing the interests of a community. For example, as Tim McCaskell documents in *Queer*

Progress,⁸ it was hugely important to the LGBTQ community to have Kyle Rae – an openly gay man – elected to city council. Rae’s election both marked and contributed to increased acceptance of the LGBTQ community, and Toronto’s growing identification as a city that welcomed persons of all sexual orientations and gender identities. Prior to being elected to city council, Rae had been the co-ordinator of Pride; as a city councillor he was instrumental in increasing the visibility and acceptability of Pride, and developing it from a local community celebration into a Toronto-wide and indeed international event. 240

38. Notwithstanding that the majority of LGBTQ residents of the city did not reside in Rae’s ward, they nevertheless saw him as representing their interests and those of their community at city council. While the nature of Toronto’s city council meant that they could not vote for him directly, many nevertheless actively supported his campaign – and those of other LGBTQ candidates – by donating their time and financial and other resources.

39. This is but one instance in which members of a particular community have worked creatively to achieve a more diverse city council, despite the challenges of Toronto’s ward-based system.

(c) The Impact of the *Better Local Government Act*

40. Changing ward boundaries mere months before an election impairs both the responsiveness and representativeness of local government. As set out above, within Toronto’s city council system, responsive government – government that reflects the interests and meets the needs of geographically-defined constituencies – depends on candidates’ and

⁸ Tim McCaskell, *Queer Progress: From homophobia to homonationalism* (Toronto: Between the Lines, 2017).

ultimately councillors' direct and local knowledge of the communities they represent. Even if **241** candidates were ultimately able to develop the requisite kind and degree of local knowledge across the much larger geographic areas and populations represented in the 25 ward system, which I do not accept, it clearly is not possible for them to do so over the span of 10 weeks and with an election already in progress.

41. As set out above, successful campaigns for municipal government are particularly dependent on electors' specific knowledge of their candidates. It is impossible for candidates to campaign effectively – which in this context means engaging directly with constituents – when constituencies are doubled in size, or split in half and recombined with other areas, after an election is already underway.

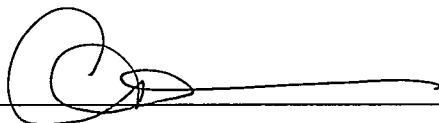
42. Equally, electors' ability to get to know their candidates within this highly abbreviated timeline is significantly constrained. This is particularly problematic in the absence of political parties or slates of candidates, where decisions with respect to how and indeed whether to vote are that much more dependent on direct knowledge and experience of one or more candidates. Within the context of Toronto's ward-based city council system, changing ward boundaries this close to an election will effectively deny many city residents the ability to cast their ballot on a meaningfully informed basis.

43. It also frustrates electors' efforts to achieve a city council that represents communities defined other than simply by geography. Creative strategies of co-ordinated organizing, fundraising or campaigning focused around particular neighbourhoods and/or candidates identified with particular communities will be disrupted, and the time and resources invested in those strategic efforts largely erased.

44. While the shift to much larger constituencies would be detrimental to responsive, **242** representative and effective local government at any time, the negative impacts of that shift are much more pronounced when it is implemented in the midst of an ongoing election and in an exceedingly compressed timeframe. Similarly, while it would arguably be objectionable on both practical and principled grounds to change the electoral boundaries for any level of government shortly before a scheduled election, the impact of doing so in the context of Toronto's ward based system of government is that much more severe.

45. I swear this affidavit in support of the Applicants' application and for no other or improper purpose.

AFFIRMED BEFORE ME at the City of Toronto, Ontario this 20th day of August, 2018.



A Commissioner for taking Affidavits (*or as may be*)

} 

MARIANA VALVERDE

Exhibit “A”

Curriculum Vitae

This is Exhibit "A" referred to in the affidavit of Mariana Valverde sworn before me this 20th day of August 2018

April 2017

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[Signature]
A COMMISSIONER, ETC.
Mariana Valverde

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Degrees

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1976-77 M.A. Social and Political Thought, York University
1977-82 PhD Social and Political Thought, York University

Current position:

Professor, Centre of Criminology and Sociological Studies, University of Toronto
(Status only cross appointments to Faculty of Law, Women/Gender Studies & Geography/Planning)

Previous positions:

- 1984-87 Sessional lecturer, Women's Studies and Sociology, Univ. of Toronto
1987-88 Sessional lecturer, Women's Studies and Criminology, Univ. of Toronto
1988-89 Assistant Professor, Women's Studies and Sociology, Trent University
1989-93 Associate Professor of Sociology, York University (Tenured 1992)
1993-98 Associate Professor of Criminology, University of Toronto

Professional activities:

- Chief editor of Canadian Journal of Law and Society (January 2008-June 2014)
- Member of executive, [US] Law & Society Association (2011-14)
- President, Canadian Law and Society Association (2005-07)
- Member of national SSHRC adjudication panel for standard faculty grants, 2004 and 2005; 2015-16
- Serving on editorial boards of Economy and Society (2001-present), Law and Society Review (2003-06), Law and Social Inquiry (2002-2010), Law in context (2002-present), Law, Text, Culture (2011-present); Theoretical Criminology
- Board member, Canadian Law and Society Association (2002-2014)
- Co-editor, Feminist Studies (1994-2001)
- Member of numerous committees of the Law and Society Association (1997 to present), including chairing the Graduate Student Workshop committee (2002), chairing Jacob book prize committee (2015-16), and numerous others.

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- Trustee of Law and Society Association (1999-2002; 2011-14)
- Co-organizer of international workshop on social and legal theory, 'New forms of governance', at Univ. of Toronto (also edited conference proceedings), October '96.
- Main organizer of research workshop 'Wife assault and the criminal justice system', Univ. of Toronto, November 1994
- Main organizer of international workshop in social and legal studies 'Radically Rethinking Regulation', Univ. of Toronto, April 1994.
- Sole editor of a special issue of the Canadian Journal of Sociology on 'moral regulation' (publ. Spring 1994).
- Refereeing of grants for SSHRC, Australian Research Council, NSF, and British Economic and Social Research council -- several per year, 1991 to the present.
- Evaluation of book manuscripts for: Duke University Press (3), University of Toronto Press (4), University of California Press (1), University of Chicago Press (2), Cambridge University Press (3), Social Science Federation of Canada (several), Columbia University Press (1), Princeton University Press (1), Stanford University Press (1), Routledge/Cavendish (2)
- Regularly refereeing manuscripts for numerous journals including: Economy and Society; Law and Society Review; Canadian Historical Review; Canadian Review of Sociology and Anthropology; Journal of the History of Sexuality; City and Society
- External examiner of theses for graduate degrees in other universities: Law PhD Sciences Po (2018); Law PhD (UBC, 2012, 2014), Law PhD (University of Bristol, 2012); Sociology PhD (Alberta, 2011); History, UQAM (2011); PhD in Sociology, Carleton (2004, and then again 2017); PhD in Humanities, Griffiths University (2002), PhD in Community Health, Melbourne Univ., (2002); PhD in Political Science, Australian National University (2000) Ph.D. in Public Health, LaTrobe University ('99); PhD in Political Science, York University ('99); LI.M Osgoode (one in 2007, one in 1995); LI.M. McGill ('97); PhD in Religious Studies, Concordia ('90); Ph.D. in History, Rutgers University ('91); PhD in Social and Political Thought, York University ('96 and '99);)
- Regular refereeing of tenure and promotion files for numerous universities in Canada and abroad.
- Participation as presenter, chair and/or discussant in numerous meetings of the Canadian Historical Association, Canadian Association of Sociology and Anthropology, Social Science History Association, Law and Society Association, Berkshire Women's History Conference.

University service (selected):

- Acting/Interim Director, Centre for Criminology & Sociolegal Studies, Jan-Dec. 2016.
- Member of SSHRC Insight Grant adjudication committee for Law and Criminology, 2015-2016
- Director, Centre of Criminology & Sociolegal Studies (October 2007-July 2013)
- Member, Woodsworth College Council (2007-2013, 2014-15, 2015-16)
- Member of advisory committee for Centre for Forensic Science (2007-13)
- Member of Arts and Science promotion (to full professor) committee, 2006-08
- Program Director, Sexual Diversity Studies Program, University College, 2006-7

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- Member of School of Graduate Studies Division II Executive, 1998-2000
- Graduate Coordinator, Centre of Criminology, 1996-2000
- Member of steering committee, Sexual Diversity Studies Programme, 1997-present
- Member of Ontario Council of Graduate Studies Appraisals Committee, 1990-93
- Chair of one of the 3 Appraisals Committees of OCGS, 1992-3
- Various departmental committees, Trent University and York University, 1988-1992

Community service (selected):

- Member of 'sex work policy group', Toronto, (2010-12)
- Member of expert advisory committee for project on criminalization of people with HIV (2009-11) [project funded by Ontario HIV-AIDS network]
- Toronto Police-community liaison committee for LGBT issues (2007-8)
- Interviews for radio, television and print media on a variety of subjects from prostitution regulation to city bylaws - on average, two per month.
- Expert witness evidence in eight Ontario Human Rights cases (all concerning discrimination on the basis of sexual discrimination), in one New Brunswick Human Rights Commission case ('98), and in one equality rights case in federal court.
- Member of national committee for intervention in **Little Sisters** Supreme Court case (for the Women's Legal Education and Action Fund); 1999-2000
- Member of national consultative committee called by EGALE to discuss challenges to prostitution laws (2005)

Honours

Kalven prize of the Law and Society Association (for lifetime leadership in sociolegal research), 2016.

Appointed visiting professor, Ecole des Hautes Etudes en Sciences Sociales, May 1-30 2016.

Distinguished visitor/lecturer, Baldy Centre for Law and Social Policy, University at Buffalo, Fall 2011

Distinguished Visitor, University of Sydney Law School, October 2009.

Elected Fellow of the Royal Society of Canada, 2006.

Research grants and contracts

- o 1977-82: SSHRC Doctoral Fellowship
- o 1982-84: SSHRC Post-doctoral Fellowship
- o 1991-94: SSHRC regular three-year faculty grant (\$12,000)
- o 1993-94: Contract to evaluate Metro Toronto Woman Abuse Protocol (\$10,000)

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- 1995 Connaught Conference Fund, Univ. of Toronto (\$8,000)
[Joint application with Lorna Weir of York University]
- 1995: Ministries of Justice and Health contract for a conference on the regulation of reproductive technologies (\$30,000)
[Joint application with Lorna Weir from York]
- 1996-99: SSHRC regular 3-year faculty grant (\$23,000)
- 1993-98: Several small grants (\$800 each) for travel to international conferences from Centre of Criminology and School of Graduate Studies
- 1999: Law Commission of Canada: Contract to write a framework document on 'law and governance relationships' (\$20,000)
- 1999: SSHRC, 3-year standard research grant (\$40,000)
- 2000: General Research Grant, School of Graduate Studies (\$2,000)
- 2000: Pink Triangle Press -policing of Toronto gay community (\$2,000)
- 2001-04: SSHRC Co-investigator on standard research grant on dissemination and policing of pornography; PI, Brian Pronger (\$145,000)
- 2003-07: SSHRC standard research grant, urban law in action (\$45,000)
- 2003: Law Commission of Canada contract for report on 'legal knowledges of risk' (with Ron Levi and Dawn Moore) (\$3,000)
- 2003: Joint Law Commission of Canada/SSHRC 'Relationships in transition' one-year grant, with Ron Levi (\$12,910)
- 2003: SSHRC standard research grant - Co-investigator, PI, Paula Maurutto – on governance in the voluntary sector (\$50,000)
- 2004/05: Law Commission of Canada/SSHRC, 'Freedom of choice' theme, contract, \$10,000 (with Ron Levi). Report submitted February 2005.
- 2008-12: SSHRC Standard research grant, for comparative historical sociology of 'good' versus 'bad' neighbourhoods (\$45,500 over three years)
- 2009: Collaborator on SSHRC MCRI grant proposal on "law's use of science" (PI Prof. Martin Evinson, UTM (\$500,000). Proposal went through first screening in spring 2009 but was not successful in the final round.
- 2012: John Beattie fund, Centre for Criminology and Sociolegal Studies, \$3,000, aboriginal land claims in the urban context seed grant.
- 2013-17: P.I., SSHRC Insight grant on public-private partnerships in local governance (\$90,000) – with Prof. Sue Bunce (UTWC) and Prof. A. Moore (Winnipeg) as co-investigators

PUBLICATIONS

Books (* denotes refereed)

M. Valverde, Michel Foucault. London, Routledge (February 2017). [Semi-refereed]

*M. Valverde, Chronotopes of law: jurisdiction, scale, and governance. London, M Valverde, Curriculum Vitae

Routledge, 2015. 186 pp.

* M. Valverde, Everyday law on the street: city governance in an age of diversity. Chicago, University of Chicago Press, 2012. 305 pp.

Winner of 2013 Herbert Jacobs book award, Law and Society Association ('for a major contribution to sociolegal scholarship)

M. Valverde, The force of law. Toronto: Groundwork/House of Anansi Press, 2010. 144 pp. (Popular small-format book). Korean translation, 2011. Second edition of Korean translation, 2017.

* M. Valverde, The age of light, soap, and water: moral reform in English Canada 1880s-1920s. Second edition, with new preface (Toronto, University of Toronto Press, 2008.) 205 pp.

Markus Dubber and M. Valverde, eds., Police and the Liberal State. Stanford University Press, 2008.

M. Valverde, Law and order: signs, meanings, myths. London: Cavendish/Routledge, 2006.

Markus Dubber and M. Valverde, eds., The new police science: the police power in domestic and international governance. Stanford University Press, 2006.

Peter Goodrich and M. Valverde, eds., Nietzsche and legal theory: half-written laws. New York, Routledge, 2005.

* M. Valverde, Law's dream of a common knowledge. Princeton, Princeton Univ. Press, 2003. 248 pp.

* M. Valverde, Diseases of the will: alcohol and the dilemmas of freedom. Cambridge, Cambridge University Press, 1998. 251 pp.

- Co-winner of the 2000 Herbert Jacob Biannual Book Prize by the Law and Society Association, "for a major contribution to sociolegal scholarship."

M. Valverde, L. Macleod and K. Johnson, eds., Wife assault and the Canadian criminal justice system: Issues and policies (Toronto, Centre of Criminology, 1995) 375 pp.

M. Valverde, ed., Studies in moral regulation (Toronto, Centre of Criminology, 1994)
- Book version of special issue of Canadian J. of Sociology

* F. Iacovetta and M. Valverde, eds., Gender conflicts: New essays in women's history (Toronto, University of Toronto Press, 1992).

* M. Valverde, The age of light, soap, and water: moral reform in English Canada

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1880s-1920s (Toronto, McClelland and Stewart, 1991). Second edition with new preface, University of Toronto Press 2010.

- chapter 1 reprinted in A. Glasbeek, ed., Moral regulation and governance in Canada (CSPI 2006); various chapters reprinted in numerous course packages in Canadian history courses.

M. Valverde, Sex, power and pleasure (Toronto, Women's Press, 1985; and Philadelphia, New Society, 1987). 212 pp.

- Published in French, with a new introduction, as Sexe, pouvoir, plaisir by Remue-Menage, Montreal, 1989.

- Published in German, with a new introduction, as Sex, Macht, und Lust by Orlanda Frauenverlag, Berlin, 1989.

- German translation republished as mass-market paperback by Fischer Verlag, 1994.

- chapter II reprinted in B. Fox, ed., Family Bonds and Gender Divisions (Toronto, Canadian Scholars Press, 1990; and second edition, 2000); numerous excerpts included in B. Crow and L. Gotell, eds., Introduction to Women's Studies Reader (Toronto, Prentice Hall, 1999); excerpt re-published in M. Storr, ed., The bisexuality reader (London, Routledge, 1999)

- other excerpts republished in other anthologies on sexuality.

K. McDonnell and M. Valverde, eds., The healthsharing book: resources for Canadian women (Toronto, Women's Press, 1985).

Book chapters

Note: refereed books marked with an asterisk *

Note: all chapters and articles single-authored unless otherwise indicated

"Deepening the conversation on jurisdiction between socio-legal theory and legal scholarship" – in Maksymilian del Mar, ed., Oxford Handbook of Jurisdiction in International Law (in press).

Maureen Fitzgerald and Mariana Valverde, "City of love at the castle on the hill" forthcoming in M. Fitzgerald and J. Lorinc, eds., Any Other Way: Gay Toronto. Toronto, Coach House Press, 2018.

"Miserology: a new look at the history of criminology" in A. Natapoff, ed., New Criminal Justice Thinking. NYU Press, 2017.

"Ad hoc governance and urban infrastructure partnerships in historical perspective" in M. Brady and R. Lippert, ed., Governing practices: Neoliberal urbanism and ethnography (Toronto, University of Toronto Press). 199-220. *

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"Ad hoc governance and infrastructure projects in North America" – translated into Spanish, for an anthology edited Antonio Azuela, La ciudad y sus reglas. Mexico City: UNAM university press and Lincoln Institute for Land Policy, (2017). [very similar to the chapter listed just above].

"A tale of two—or three—cities: gentrification and community consultations" in J. Pietter and John Lorinc, eds., Subdivided: city governance in an age of hyper-diversity. Toronto, Coach House Press, 199-208.

"Le radici investigative della rivoluzione scientifica" in A. Di Lisciandro, ed., Michel Foucault: Diritto, sapere, verita. Milan: Ledizione Ledi, 2015, 171-199.

"Policing the Lord's Day" in M. McClelland and J. Lorinc, eds., The Ward: Toronto's first immigrant neighbourhood. Toronto, CoachHouse Press, 2015, 71-76.

M. Valverde and A. Weaver, "'The Crown wears many hats': aboriginal legal cases and the blackboxing of empire". In Kyle McGee, ed., Latour and the passage of law (Edinburgh, Edinburgh University Press, 2015), pp. 215-150.

"Beyond the spatial fix: towards a multidimensional approach to local security networks" forthcoming in I. Loader, B. Jauregui and J. Steinberg, eds., Global Policing, Oxford, Oxford University Press, in press. 22 ms. pages.

"From bad to worse via a successful constitutional challenge: the tragedy of prostitution law reform in Canada" forthcoming in Janet Halley et al, eds., Governance feminism: an anthology (Minneapolis, University of Minnesota Press). 38 ms. pages

P. O'Malley and M. Valverde, "Focault: the governmentalisation of law and justice" in Foundational Texts in the Criminal Law, ed. by Markus Dubber. Oxford UP, 2014, pp. 215-250.

M. Valverde and P. O'Malley, "Criminology" in Oxford Handbook of Criminal Law, ed. Markus Dubber and Tatjana Hoernle, Oxford UP, 2015, pp. 3-25.

"The legal regulation of sex and sexuality" in Rosemary Gartner and Bill McCarthy, eds., The Oxford Handbook of Crime, Gender and Sexuality. Oxford UP, 2014, pp. 635-652.

"Time thickens, takes on flesh': spatiotemporal dynamics in law" in I. Braverman et al, eds., The expanding spaces of law: a timely legal geography. Stanford, Stanford University Press, 2014, pp. 53-77.

"Lombroso's Criminal Woman and the uneven development of the modern lesbian identity" in P. Knepper and P.J. Ystehede, eds., The Lombroso Handbook. London, Routledge, 2013, pp. 201-214.

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* "Beyond the Criminal Code: municipal licensing and zoning bylaws", co-authored with Emily van der Meulen, in E. Van der Meulen et al, eds., Selling sex: experience, advocacy, and research in Canada. Vancouver, University of British Columbia Press, 2013, pp. 313-322.

"Conclusion: analyser les risques et la gestion du risque" in D. Niget and M. Petitclerc, eds., Pour une histoire du risque. Preses Universitaires du Quebec, Presses Universitaires de Rennes, 2012, pp. 240-250.

*"The question of scale in urban criminology", in Adam Crawford, ed., International and Comparative Criminal Justice and Urban Governance, Cambridge, Cambridge University Press, 2011, 567-587

* "Law versus history: Foucault's genealogy of modern sovereignty" in Andrew Neal and Michael Dillon, eds., Foucault on politics, security, and war. (London, Palgrave Macmillan, 2008), 135-151

* "Police, law, and sovereignty in Foucault's College de France lectures" in M. Dubber and M. Valverde, eds., Police and the liberal state (Stanford, Stanford University Press, 2008), 15-32

* "Bodies, words, identities: the moving targets of the criminal law" in M. Dubber and L. Farmer, eds., Criminal Justice Histories (Stanford, Stanford University Press, 2007), pp. 224-251.

"Toronto: a 'multicultural' urban order" in A. Philippopoulos-Mihalopoulos, ed., Law and the City. (London, Routledge-Cavendish, 2007), pp. 191-204.

"'Craving' research: smart drugs and the elusiveness of desire" in Sabine Maasen and Barbara Sutter, eds., On willing selves: neoliberal politics vis-a-vis the neuroscientific challenge. (London, Palgrave-Macmillan, 2007), pp.167-188.

* "How law knows: theoretical and methodological issues" in A. Sarat et al., eds. How law knows (University of Michigan Press, 2007), pp. 72-93

* "Peace, order, and good government: police-like powers in postcolonial perspective" in M. Dubber and M. Valverde, eds., The new police science (Stanford University Press, 2006), pp. 73-106.

"Pain, memory, and the creation of the liberal subject: Nietzsche on the criminal law" in P. Goodrich and M. Valverde, eds., Nietzsche and legal theory: half-written laws (New York, Routledge, 2005), 67-89.

- *Shortened version published in Korean in Postmodern Jurisprudence, ed. Prof. Yi, Seoul, 2007.*

* "Experience and truth telling in a post-humanist world: a Foucaultian contribution to feminist ethical reflections" in Karen Vintges and Diana Taylor, eds., Feminism and the final Foucault (University of Illinois Press, 2004), 63-90.

M. Valverde and M. Mopas, "Insecurity and the dream of targeted governance" in W. Larner and W. Walters, eds., Global Governmentality (London, Routledge, 2004), 233-250.

"Targeted governance and the problem of desire" in R. Ericson and A. Doyle, eds., Risk and morality (Toronto, University of Toronto Press, 2003), 438-458.

M. Valverde and D. Moore, "Party girls and predators: chronotopes of female risk" in Debi Brock, ed., Making normal: social regulation in Canada (Toronto, Harcourt Brace, 2003), pp 306-328.

[revised version of 'Maidens at risk' 2000 article in Economy and Society]

"Governing security, governing through security", in R. Daniels, P. Macklem and K. Roach, eds., The security of freedom: essays on Canada's antiterrorism bill (Toronto, University of Toronto Press, 2001).

"Racial poison: alcohol, race and gender in first-wave feminism" in I. Fletcher, P. Levine, and L. Mayhall, eds., Elusive sisterhood: women's suffrage, citizenship, nation and race in the British Empire (New York, Routledge, 2000) pp. 32-50.

* "Judging speech: an inquiry into the Supreme Court's theory of signification" in A. Hutchinson and K. Petersen, eds., Censorship in Canada today (Toronto, University of Toronto Press, 1999) pp. 56-79.

* "Building an anti-delinquent city: gender, youth and morality in the post-war city" in J. Parr, ed., A diversity of women: postwar Ontario 1945-1970 (Toronto, University of Toronto Press, 1995) pp. 19-45.

* "Sexuality" Chapter in an introductory sociology textbook, R. Brym ed., New Society: Sociology for the twenty-first century (Toronto, Harcourt Brace, 1995; revised second edition, 1997), pp. 74-102.

* "'When the mother of the race is free': 'race' in first-wave feminist sexual and reproductive politics" in F. Iacovetta and M. Valverde, eds., Gender conflicts: new essays in women's history (Toronto, University of Toronto Press, 1992), pp. 3-26.

"Representing childhood: the multiple fathers of the Dionne quintuplets" in C. Smart, eds., Regulating motherhood: historical essays on sexuality, marriage, and motherhood (London, Routledge, 1992), pp. 119-146.

* L. De La Cour, C. Morgan and M. Valverde, "Gender and state formation in nineteenth
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century Ontario" in A. Greer and I. Radforth, eds., Colonial Leviathan: state formation and society in mid-nineteenth century Canada (Toronto, University of Toronto Press, 1992), pp. 163-191.

* "Racism and antiracism in feminist research" in C. Backhouse and D. Flaherty, eds., Challenging times: the women's movement in Canada and the United States (Montreal, McGill-Queen's Press, 1992), pp. 160-165.

"Feminist perspectives in criminology" in R. Ericson and C. Shearing, eds., Criminology Reader (Toronto, Centre of Criminology, 1991), pp. 239-257.

"Too much heat, not enough light" in L. Bell, ed., Good girls/bad girls: sex trade workers and feminists face to face (Toronto, Women's Press, 1987), pp. 27-33.

M. Valverde and L. Weir, "The state, the media, and women's sexuality" in V. Burstyn, ed., Women against censorship (Vancouver and Toronto, Douglas and MacIntyre, 1985), pp. 135-147.

"Pornography" in C. Guberman and M. Wolfe, eds., No safe place: violence against women and children (Toronto, Women's Press, 1985), pp. 127-158.

Refereed journal articles

Note: articles sole-authored unless otherwise indicated

Mariana Valverde, Fleur Johns and Jen Raso "Governing infrastructure in the age of the art of the deal" forthcoming in Political and Legal Anthropology Review

Mariana Valverde and Aaron Moore, "The performance of transparency in public-private infrastructure governance: the politics of documentary practices" Urban Studies Feb. 2018. [Vol and page #s not yet available, published online first]

"From persons and their acts to webs of relationships: some theoretical resources for environmental justice" Crime, Law and Social Change Vol. 68 no. 5 (2017), 547-562.

"The re-scaling of feminist analyses of law and state power: from (domestic) subjectivity to (transnational) governance networks", University of California at Irvine Law Review Vol. 4 no. 1 (2014), 325-353.

"Studying the governance of crime and security: space, time, and jurisdiction" Criminology and Criminal Justice Vol. 14 issue 4 (2014) pp. 379-391.

"Between a rock and a hard place: legal studies beyond both disciplinarity and interdisciplinarity" Critical Analyses of Law [online journal, not refereed], Vol. 1 no. 1
M Valverde, Curriculum Vitae

(2014).

"Sind wir Poststrukturalistinnen? Foucaults Vermachtnis und der Stellenwert von Theorie in zeitgenössischen Analysen von Recht und Sicherheit" Kriminologisches Journal 10, 2012, 58-78.

"Analyzing punishment: scope and scale" Theoretical Criminology Vol. 16 no 2, (Spring 2012) 245-255

"The Crown in a multicultural age: the changing epistemology of (post)colonial sovereignty" Social and Legal Studies 21, 1 (March 2012), 3-21 [lead article]

"Seeing like a city: the dialectic of modern and premodern knowledges in urban governance", Law and Society Review. 45 no. 2 (June 2011), 277-313.

"Questions of security: a framework for research", Theoretical Criminology Vol. 15, no 1 (2011), 3-23.

"Practices of criminalization and scales of citizenship", New Criminal Law Review Vol. 13, no. 2 (2010), 216-240.

"Remembering Walter Benjamin from both sides of the Pyrenees", Public Culture 21, 3 (2009), 441-450.

"Laws of the street" City and Society vol. 21, no. 2 (2009), 163-181.

"Comment" on Loic Wacquant's Punishing the Poor, Theoretical Criminology Vol. 14, no. 1 (2010), 117-19; simultaneously published in six languages in various European journals.

"Jurisdiction and scale: legal 'technicalities' as resources for theory:". Social and Legal Studies Vol. 18, no 2, June 2009, 139-158.

Reprinted in K.F. As, ed., The globalization of crime, Sage, October 2013.

"Analyzing the governance of security: jurisdiction and scale". Behemoth [an international electronic journal of social theory, www.behemoth-journal.de] (2008)

"The ethic of urban diversity: urban norms and local law" Law and Social Inquiry, Vol. 33, no. 4 (Fall 2008), 895-925.

M. Valverde and R. Levi, "Freedom of the city: Canadian cities and the quest for governmental status" Osgoode Hall Law Journal Vol. 44 no. 3, Fall 2006, 409-460.

"The sociology of law as 'a means against struggle itself'" Social and Legal Studies Vol. 15, no. 4 (December 2006), 591-598.

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Prashan Ranansinghe and M. Valverde, "Governing homelessness through land use" Canadian Journal of Sociology vol. 31 no. 3, (2006), 325-350.

"Taking land use seriously: toward an ontology of municipal law" Law, Text, Culture vol. 9 (2005), 34-59.

"Authorizing the production of urban moral order: appellate courts and their knowledge games" Law and Society Review, Vol. 39, no. 2, June 2005, 419-455.

"A post-colonial women's law? Domestic violence and the Ontario Liquor Board's 'Indian list', 1950-1990" Feminist Studies Fall 2004, Vol. 30, no. 3, 566-589.

P. O'Malley and M. Valverde, "The uses of pleasure in the liberal governance of drugs and alcohol" Sociology: Journal of the British Sociological Association Vol. 38:1, 25-42 (Winter 2004), 25-42.

"Pragmatist and non-pragmatist knowledge practices in American law" PoLAR: Political and Legal Anthropology Review, Vol. 26, no. 2, November 2003, 86-108.

"'Which side are you on?' Uses of the everyday in sociolegal scholarship" PoLAR (Political and Legal Anthropology Review) Vol. 26, no. 1 (May 2003), 86-98.

"Police science, British style: pub licensing and knowledges of urban disorder" Economy and Society Vol. 43 no. 2 (May 2003), 234-53.

M. Valverde and M. Cirak, "Governing bodies, creating gay spaces: police and security issues in Toronto's gay village" British J. of Criminology, 43 (2003), 102-21.
- Reprinted in L. Moran, ed., Sexuality and Identity, Ashgate 2006.

"Justice as irony: a queer ethical experiment" Law and Literature Vol. 14 no. 1, Spring 2002, pp. 85-102.
- Korean translation in Postmodern Jurisprudence, ed. Prof. Yi, Seoul 2007.

A. Pratt and M. Valverde, "From deserving victims to 'masters of confusion': redefining refugees in the 1990s" Canadian Journal of Sociology, Vol. 27, no. 2 (2002) pp. 135-161.

R. Levi and M. Valverde, "Knowledge on tap: police science and everyday knowledge in the legal regulation of drunkenness" Law and Social Inquiry, Vol. 26 no. 4 (Fall 2001), 819-846
- Reprinted in Elizabeth Mertz, ed., The role of social science in law (Ashgate, 2008)

"Some remarks on the rise and fall of discourse analysis" Social history/ Histoire sociale
M Valverde, Curriculum Vitae

(spring 2001), 59-77.

D. Moore and M. Valverde, "Maidens at risk: 'date rape drugs' and the formation of hybrid risk knowledges" Economy and Society Vol. 20 no. 4 (fall 2000), 514-531.

"The harms of sex and the risks of breasts: obscenity and indecency in Canadian law" Social and Legal Studies vol. 8 no. 2 (June 1999), 181-198.

"Derrida's justice and Foucault's freedom: ethics, history and social movements" Law and Social Inquiry Vol. 24, no. 3 (Summer 1999), 655-676.

- Reprinted in R. Cotterrell, ed., Sociological perspectives on law: contemporary debates (Aldershot, Ashgate, 2001).

M. Valverde and K. White-Mair, "'One day at a time' and other slogans for everyday life: the ethical practices of Alcoholics Anonymous" Sociology: Journal of the British Sociological Association vol. 33 no. 2 (May 1999), 393-410.

N. Rose and M. Valverde, "Governed by law?" Social and Legal Studies Vol. 7 no. 4 (Dec. 1998), 569-579.

- Reprinted in R. Cotterrell, ed., Sociological perspectives in law: contemporary debates (Aldershot, Ashgate, 2001)

"Governing out of habit" Studies in Law, Politics and Society 18 (1998), 212-247.

"'Slavery from within': the invention of alcoholism and the question of free will in late Victorian Britain" Social History Vol. 22 no. 3 (Oct. 1997), 251-268.

- Reprinted in S. McGregor, ed., Drug and alcohol studies [Reference book]. London, Sage, 2014.

"Six dimensions of social governance: research questions beyond the dichotomy of public and private" in Cahiers d'histoire (mars 1997), 40-55.

"The social purity movement in Canada" Toronto Journal of Theology Vol. 12, no. 2 (Fall 1996), 223-227.

"Social facticity and the law: a social expert's eyewitness account of law" Social and Legal Studies Vol. 5 no. 1 (June 1996), 201-217.

"'Despotism' and the ethical liberal subject" Economy and Society Vol. 25 no. 3 (Aug. 1996), 357-372.

"The dialectic of the familiar and the unfamiliar: the 'jungle' in early urban sociology" Sociology: J. of the British Sociological Association Vol. 30, no. 3 (Aug. 1996), 493-510.

"La charité et l'état: un mariage centenaire" Lien social et politiques 33 (Summer 1995),
M Valverde, Curriculum Vitae

27-37.

"The mixed economy as a Canadian tradition" Studies in Political Economy 47 (Summer 1995), 33-60.

- Reprinted in P. Armstrong and P. Evans, eds., Feminism, political economy and the state (Toronto, Canadian Scholars Press, 1999)

"Families, private property, and the state: the Dionne quintuplets and the Toronto Stork Derby" Journal of Canadian Studies Vol. 29 no. 4 (Spring 1995), 15-35.

- Reprinted in J. Parr and M. Rosenfeld, eds., Gender and history in Canada (Toronto, Copp Clark, 1996).

"Moral capital" Canadian Journal of Law and Society Vol. 9 no. 1 (Spring 1994), 213-232.

"As if there were subjects: discourses and social subjectivity" Canadian Review of Sociology and Anthropology Vol. 28 no. 3 (May 1991) 173-187.

"The rhetoric of reform: tropes and the moral subject" International Journal of the Sociology of Law Vol. 18 no. 1 (1990), 61-73.

"Beyond gender dangers and private pleasures: theory and ethics in the sex debates" Feminist Studies Vol. 15 no. 2 (Summer 1989), pp. 237-254.

- Reprinted in two anthologies of feminist legal studies

M. Valverde and L. Weir, "The struggles of the immoral: preliminary remarks on moral regulation" Resources for Feminist Research Vol. 17, no. 3 (1988), 31-35.

Reprinted in S. Heald, Moral Regulation Reader (Toronto, Canadian Scholars Press, 1995) and in A. Glasbeek, Moral regulation and governance in Canada (2006)

"'Giving the female a domestic turn': the legal, social and moral regulation of women's work in British cotton mills, 1820-1850" Journal of Social History, Vol. 21, no. 4 (June 1988), 619-634.

Article nominated by the journal for Berkshire prize in women's history.

"The love of finery: fashion and the fallen woman in nineteenth century social discourse" Victorian Studies Vol. 32, no. 2 (winter 1989), 168-188.

Major review essays (single authored unless otherwise specified)

Review essay on Michel Foucault's 1973 College de France lectures, The punitive society, ed. Bernard Harcourt – forthcoming in British Journal of Criminology.

"Foucault's criminology lectures: new insights on the history of legal forms" Major review
M Valverde, Curriculum Vitae

essay on M. Foucault, Mal faire, dire vrai (Louvain lectures), forthcoming in Law and Social Inquiry. [Note – edited Italian translation already published, see under book chapters above].

“Spectres of Foucault in law and society scholarship” Annual Review of Law and Social Science, Vol. 4, 2010, 45-61.

Ron Levi and Mariana Valverde, “Studying law by association” [Review essay on Bruno Latour and legal studies], Law and Social Inquiry Vol. 33 no. 2, 805-827 (2008)

Review essay on Bruno Latour’s Re-assembling the social, Law and Society Review (2008).

N. Rose, P. O’Malley and M. Valverde, “Governmentality” Annual Review of Law and Social Science No. 2, December 2006, pp. 83-104.

“Genealogies of European states: Foucaultian reflections” [Major review essay of two volumes of Foucault’s lectures], Economy and Society Vol. 36, no. 1 (February 2007), 159-178.

Review essay of Michel Foucault, Society must be defended, in Law, culture, and the humanities, Vol. 1 no. 1, March 2004, 119-131.

“Money, sex, and speech: the law of speech and law as speech” [Review essay of Dissent, injustice, and the meanings of America by S. Shiffrin] Texas Law Review (2000)

“The personal is the political: justice and gender in deconstruction” [Review essay on J. Derrida, Politics of friendship] Economy and Society Vol. 28, no. 2 (May 1999), 300-312.

“Identity politics and the law in the US” [Review essay on six books] Feminist Studies Vol. 25 no. 3 (Winter 1999)

“Deconstructive communism?” [Review essay on J. Derrida, Spectres of Marx] Labour/ le travail 36 (Autumn 1995) 329-340.

“‘No baby? No nation!’” [Review essay on five books on state regulation of motherhood] Signs Vol. 20 no. 2 (Fall 1994).

“Pauperism, moral character, and the liberal state” [Review essay on three books on 19th century philanthropy] Labour/ le travail 30 (Fall 1992).

“Poststructuralist gender historians: are we those names?” [Review essay on Joan Scott’s Gender and the politics of history and D. Riley, Am I that name?] Labour/ le travail 25 (1990), 227-236.

M Valverde, Curriculum Vitae

Other publications (selected)

Author's response – to three-review symposium on my Chronotopes of Law book, Feminist Legal Studies no. 23, 2015.

Author's response – to three-review symposium on my Chronotopes of Law book, Canadian Journal of Law and Society, Vol. 31 no. 1 (2016).

"'Non-legality' and society" (contribution to symposium on Fleur Johns' Unruly Law), Leiden Journal of International Law vol. 27 no. 4, Dec. 2014, 961-66.

"Beyond *Discipline and Punish*: Foucault's challenge to criminology" in Carceral Notebooks vol. 4 (University of Chicago), 2009, 201-224.

M. Valverde and Ron Levi, "Gobernar a través de la comunidad" Delito y Sociedad, No. 20, 2007 [Criminology journal based in Buenos Aires]

M. Valverde, "A new entity in the history of sexuality: the respectable same-sex couple" Commentary in Feminist Studies 32, no. 1(2006), 155-162.

M. Valverde and R. Levi, Freedom of the city: a report on Canadian cities' legal quest for governmental status. Report for the Law Commission of Canada, February 2005, 65 pp.

'Governmentality' entry for New Oxford Companion to Law, co-authored with Pat O'Malley.

'Liquor control' and 'temperance' entries for the Oxford Companion to Canadian History, ed. G. Hallowell (University of Toronto Press, 2004).

'Liquor control' entry for reference book Alcohol and Temperance in Modern History, ed. I. Tyrrell and J. Blocker (2004)

M. Valverde, R. Levi and D. Moore, Legal Knowledges of Risk. A Report for the Law Commission of Canada, May 2003. 56 pp.

M. Valverde, R. Levi, C. Shearing, M. Condon and P. O'Malley, Democracy in governance: a socio-legal framework. A report for the Law Commission of Canada. 1999. 33 pp.

'Criminal justice system' and 'social purity' entries for the Routledge Encyclopedia of Feminist Thought, ed. L. Code (London, Routledge, 2000).

M Valverde, Curriculum Vitae

Three entries for H. Gilbert, ed., The sexual imagination. London, Jonathan Cape, 1993. 259

Entry for "Obscenity, pornography, censorship" in W.H. New, ed., Reader's encyclopedia of Canadian Writing. Toronto, University of Toronto Press, 2000.

M. Valverde and L. Weir, "Regulating reproductive and genetic technologies: a feminist view of recent Canadian government initiatives" Commentary in Feminist Studies Vol. 23 no. 2 (Summer 1997), 419-423.

Edited conference proceedings for the Radically rethinking regulation conference held in 1994 (Proceedings published by Centre of Criminology, 1994).

Edited conference proceedings for New forms of governance conference (Proceedings published by Centre of Criminology, 1997).

Entry for 'Dionne quintuplets' in C. King and B.K. Rothman, eds., Encyclopedia of childhood.

Two entries in the Dictionary of Canadian Biography (Florence Kinton; John G. Shearer).

Invited lectures

- "Whatever happened to 'public works'? Towards a genealogy of 'infrastructure'"
Concordia University sociology annual lecture, April 2018.

- "Deepening the conversation on jurisdiction between socio-legal theory and legal scholarship" McGill University Law School, talk in legal theory workshop, April 2018.

- Keynote lecture for 'law and the city' conference, Birkbeck School of Law, University of London, Sept. 2017.

- Lecture, seminar, and participation in day-long workshop at Australian National University, Canberra, August 2017.

- Lecture on theoretical issues in sociolegal scholarship - and a seminar for graduate students, Law faculty, Universidad de los Andes, Bogota, August 2016.

"Scale and jurisdiction in urban governance" – talk in a workshop on 'everyday law', Universidad del Norte, Barranquilla, Colombia, August 2016.

Talk on theoretical issues in sociolegal studies, law department, ICESI, Cali, Colombia, Bogota, August 2016.

M Valverde, Curriculum Vitae

“Landscapes of liberal subjectivity”, Johns Hopkins University (several departments co-sponsored the talk), September 2016.

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“The law of bad smells”. Princeton University, workshop on “Synesthesia and law”, Oct. 2016

Three lectures on Foucault and criminology for an international Master’s course, Universidad de Santa Fe, Argentina, December 2016.

Lecture on “time, space, and scale in sociolegal theory”, sponsored by several research institutes, IDAES, Buenos Aires, December 2016.

Participation in a seminar on the governance of security, University of Amsterdam, January 2017.

“Cowboy capitalism meets dysfunctional municipal regulation: what the Uber story tells us about urban governance”, invited workshop on ‘The sharing economy’, Université de Québec à Sherbrooke, Jan. 2017.

“Universities as developers in the age of ‘the art of the deal’”. University of Toronto Centre for Ethics, February 2017.

“Universities as developers in the age of ‘the art of the deal’”. Faculty of Law, University of British Columbia, workshop on ‘Law and property in the city’, March 2017.

“Universities as developers in the age of ‘the art of the deal’”. Carleton University, Sociology and Law & Legal Studies, April 2017.

“Provincializing the liberal subject: landscapes of rights, landscapes of philanthropy” Princeton University special workshop, “Landscapes of Law”, April 8, 2016.

“Beyond ‘privatization’: ad hoc assemblages of urban governance in historical perspective” MIT Planning department, April 5, 2016.

“The liberal legal subject in historical perspective: landscapes of rights, landscapes of philanthropy” Carleton University Law and Legal Studies, March 2016.

“How to study law and security: temporality, space, jurisdiction”. Keynote lecture, Brazilian association for empirical legal studies, Rio de Janeiro, August 2015.

Presentation on Chronotopes of law book, workshop on “Legal temporalities”, University of Kent at Canterbury, April 2015.

Presentation at author-meets-readers symposium on Chronotopes of law book, Queen Mary University of London, April 2015. [This was published in Feminist Legal Studies]

M Valverde, Curriculum Vitae

"Reflections on the criminological gaze", London School of Economics Criminology and criminal justice seminar, April 2015.

"The doctrine of the honour of the Crown and the blackboxing of empire in current Canadian aboriginal law" Keynote address, Practices of colonial order conference, University of Copenhagen, January 2015.

"Ad hoc governance and urban infrastructure partnerships", paper at a workshop on urban law, Mexico City (UNAM), October 2014.

"Seeing crime, managing disorder: reflections on the criminological gaze" Annual John Barry lecture, Criminology Department, University of Melbourne, August 2014.

"Scale and jurisdiction" Seminar, Faculty of Law, University of New South Wales, August 2014.

'Urban citizenship: seeing like a city, seeing like a neighbourhood'. Social science research institute, UNAM (Mexico City), March 2014.

'The ethic of diversity: law and urban norms in Toronto'. CIDE [Specialized social science university], Mexico City, March 2014.

Graduate seminar and public lecture, Geography Department, Simon Fraser University, Feb. 2014.

'Urban citizenship and ways of seeing the city'. Keynote talk at annual meeting of Heritage Canada Foundation, Ottawa, November 2013.

'Studying the governance of crime and security: space, time and jurisdiction'. Leeds University annual lecture in criminology, October 2013.

'Seeing like a city, seeing like a neighbourhood, seeing like a firm'. Georg Simmel centre for metropolitan studies, Humboldt University, Berlin, October 2013.

'How to do the history of criminology: an opinionated view' York University annual criminology lecture, March 2013, York University.

'How to do the history of criminology differently' Joint Sociology-Legal Studies lecture, Carleton University, March 2013.

'Chronotopes of law', Invited lecture, Law school, University of Kent at Canterbury, December 2012.

'Seeing like a city, seeing like a neighbourhood' Invited lecture sponsored by several M Valverde, Curriculum Vitae

departments, Open University, December 2012.

'Chronotopes of law' Birkbeck College Law Department, December 2012.

"Beyond 'law and space': towards a post-geographical approach to spatiotemporality" University of Buffalo law school (legal geography symposium), April 2012.

"Seeing like a city, seeing like a neighbourhood, seeing like a firm: scales of urban citizenship" University of Bristol (Law and Geography joint event), March 2012

"Seeing like a city, seeing like a neighbourhood, seeing like a firm" University of Victoria, February 2012.

"The death of planning?" University of Victoria Faculty of Law, February 2012.

"Seeing like a city, seeing like a neighbourhood, seeing like a firm" University of Toronto Faculty of Law (symposium on urban law) January 2011

"The death of planning?" York University, Faculty of Environmental Studies, November 2011.

"Seeing like a city, seeing like a neighbourhood: temporal and spatial scales of practices of citizenship" University of California Irvine, April 15, 2010.

"Jurisdiction and scale" Keynote address, combined Osgoode-U of T graduate students in law conference, January 30, 2010.

"Beyond Discipline and Punish: Foucault and criminology" Keynote address, Critical Criminology congress, Vienna, December 2009.

"How the earth became a collection of land uses". University of Sydney Law School, October 2009. (Distinguished Visitor)

"Community consultations and scales of citizenship", University of Western Sydney, October 2009.

Invited talk at symposium at University of British Columbia on the state of socio-legal scholarship, May 2009.

"The ethic of urban diversity", University of Kent Centre for Law, Gender and Sexuality, June 2009.

"The learned city that has trouble learning" Keynote address, Osgoode Hall conference on 'The learning city', March 5, 2009

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“Urban citizenship: beyond the rights of persons” London School of Economics (Sociology), December, 2008

“Beyond Discipline and punish: a new look at Foucault’s toolbox” London School of Economics (Law), Dec. 2008

“The question of scale in the governance of urban security” Carleton University Sociology, October 2008.

“The question of scale in urban criminology” Leeds University (Criminology), June 28, 2008

“Jurisdiction and scale: using law’s technicalities as resources for theory” Onati International Institute for the Sociology of Law, April 24, 2008.

“The ethic of urban diversity” University of Manitoba, February 2008 (Law and Society series).

“Neighbourhood experience versus city expertise” Invited workshop in legal theory jointly sponsored by Cornell Law School and LSE, London School of Economics, July 2007.

Four lectures on current criminological theory: Universitat de Girona, May 2007 (Visiting scholar).

“Sovereignty, police, and the liberal state: Foucaultian reflections” New York University Law and Society Institute, January 2007.

“Local governance, diversity, and the logic of the norm” University of Southern California (Centre for Feminist Research), November 2006

“Sovereignty, police, and the liberal state: Foucaultian reflections” Southwest School of Law, Los Angeles, November 2006.

“Local governance, diversity, and the logic of the norm” Kent University Center for the Study of Gender, Sexuality, and the Law, June 2006.

“Toward an ontology of zoning law”, University of Bristol, June 2006 (Keynote for joint Geography, Planning, and Law conference on ‘Local space and law’).

“Sovereignty, police, and the liberal state: Foucaultian reflections” Carleton University, March 2006.

“How law knows” Keynote address, Socio-Legal Studies Association, Liverpool, March 2005.

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"How law knows" Amherst College, October 2004.

"Seeing like a city: legal tools of urban ordering" Centre for Law and Society, Berkeley (Boalt Hall), February 2004.

"Foucault on race wars" University of British Columbia Sociology Dept., February 2004.

"Seeing like a city: legal tools of urban ordering" University of British Columbia Law School, February 2004.

"Race struggles and the emergence of modern states: Foucault on race, war, and modern sovereignty" Keele University Criminology Dept., November 2003.

"Race struggles and the emergence of modern states: Foucault on race, war, and modern sovereignty" Paper at special conference on 'Sovereignty and the Right of Death', Cleveland-Marshall School of Law, Cleveland, October 2003.

"Pragmatic and non-pragmatic knowledge practices in American law" Cornell University Faculty of Law (Workshop on pragmatist knowledge practices), March 28, 2003.

"Urban blight and improvement: legal networks of hybrid actors" Edinburgh Centre for Law and Society and Criminology, November 2002.

"Criminologies for and in the Americas" Keynote address, Argentinian Criminology Congress, Faculty of Law, Univ. of Buenos Aires, Sept. 2002.

"A sociolegal theory of licensing" American Bar Foundation (Chicago), April 2002.

"Truth-telling and ethics: addiction autobiographies" University of Copenhagen, December 11, 2001.

"Governing security, governing through security". University of Toronto Law School conference on Bill C-36, November 9, 2001.

"The forensic gaze and the truth of sex" Barbara Aronstein Black Lecture, Columbia University Law School, November 5, 2001.

"Justice as irony: queer ethical reflections" Nietzsche and Legal Theory conference, Cardozo Law School, New York, October 15, 2001.

"Racial masquerades: race-specific liquor laws in Canada" McMaster University, Sociology department, October 2000.

Keynote address at Nordic Alcohol Studies Council annual meeting in Reykjavik, August
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2000

Participation in invited closed workshop "Ontologies of the Political", University of Victoria August 2000.

Keynote address at Critical Legal Conference, Birkbeck College, University of London, Sept. 18, 1999. Title: "Law and the will to truth".

"Governing through alcohol" Criminal justice research group, London School of Economics and Political Science, February 16, 1999.

"Life and death questions: gender, justice, irony" London Legal Theory Workshop, February 19, 1999.

"The harms of sex and the risks of breasts in Canadian criminal law" Queen Mary and Westfield College, University of London, Department of Laws, February 1998.

"The law of breasts: indecency, money, and harm" Osgoode Hall Law School feminist speakers series, November 1997.

"Speaking of sex: North American feminists debate sexuality" Philosophy Department, University of Barcelona, April 1997.

"The harms of sex: obscenity law in Canada" Women's Studies, University of California at Berkeley, April 1997.

"Governing out of habit" History of the Present Research Network, London, May 1996.

"Governing out of habit: toward a genealogy of addiction" Lancaster University department of Sociology, May 1996.

"Governing out of habit: toward a genealogy of addiction" Carleton University jurisprudence seminar, March 1996.

"From habitual drunkard to addictive personality: some thoughts on the history of alcoholism" Queen's University Sociology department, November 1995.

"From the habitual drunkard to the addictive personality: some thoughts on the history of alcoholism" Addiction Research Foundation Social Evaluation and Research department, April 1995.

"Moral fitness and liberal ethical governance" Green College, University of British Columbia, November 1994.

"Public crime or private vice? Doing the history of alcohol" History Department University of Victoria, November 1994.

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"Uses and abuses of discourse analysis" Annual endowed lecture in social theory; Sociology department, University of Waterloo, March 1994.

"Moral capital" University of Toronto Law School, November 1992.

"Theorizing moral regulation" Osgoode Hall law school, March 1992.

- plus 16 other invited lectures, 1988-1992.

Book reviews

Over 40 reviews in a wide variety of journals (socio-legal studies, sociology, history).

TEACHING

Undergraduate courses taught

The legal regulation of morality (CRI 387, formerly WDW387; cross-listed with Sexual Diversity Studies), 2008-09, 2009-10, 2010-11, 2011-12, 2012-13, 2014-15, 2015-16, 2016-17

Representing crime, representing law and order (WDW 385), 2000-07

Crime, theory, policy (WDW300), every year 2000-07, and 2014-15, 2015-17.

Gender and crime (WDW380), every year from 1993-1997

Sexual and reproductive politics (SOC1 4090, York), 1990-91

The Canadian family (SOC1 4090, York), 1989-90

Sociological theory (SOC1 2040, York), every year from 1989 to 1992

Introduction to Women's Studies, Trent University, 1988-89

Sociology of Culture, Trent University, 1988-89

Feminist Theory, Trent University, 1988-89

History of feminism, New College, University of Toronto, every year from 1984 to 1988.

Introductory sociology, University of Toronto, 1986-87

Introduction to Women's Studies, University of Toronto, 1984-1988.

Graduate courses taught

- CRI 1050: Law and society, theoretical perspectives (2015-18)

- "Law, space and regulation" (first taught as a special topics course 2011-2012, regular course 2012-13), taken by students from 4 departments

- Designed and taught first-ever Canadian graduate course in Sexual Diversity Studies (SDS1000) 2007-08 and 2008-09

- Theories of crime and social order (CRIM 1050), 1998-99, 2001-07 (every year)

- Foucaultian tools for social and legal studies (CRIM 3310), 1997-98, 98-99, 99-00.

- Law and society: theoretical perspectives (CRIM 1020), 1993-94, 94-95, 95-96, 2009-

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10, 2010-11, 2014-15, 2015-16

- Gender and sexual difference, Sociology, York, 1991-92.
- Gender and Social Control, Centre of Criminology, 1987-88, 90-91, 91-92.
- Special topics in sociological theory, York University, 1989-90, 90-91.

Graduate supervision (summary)

(A) Completed PhD dissertations supervised

- 12 in Criminology:

- 1) "From christian maternalism to risk technologies: penal power and women's knowledges in the governance of women's prisons" (K. Hannah-Moffatt, 1997)
- 2) "A political anatomy of immigration detention" (A. Pratt, 2000)
- 3) "Unwilling mothers and unwanted babies: infanticide in Canadian law and legal practice" (K. Johnson, 2000)
- 4) "Calculated risk-taking: the governance of casino gambling in Ontario" (Phil Mun, 2002)
- 5) "To cure the offender: drugs, users and the Canadian criminal justice system" (Dawn Moore, 2004)
- 6) "Imagining and governing the Internet" (Mike Mopas, 2008)
- 7) "Refashioning vagrancy" (Prashan Ranansinghe, 2008)
- 8) "The legal genealogy of African-Canadian subjectivities" (David Sealy, 2010)
- 9) "Making crime TV" (Anita Lam, 2011)
- 10) "The criminology of debt" (Olena Kobzar, 2012)
- 11) "Community agencies as actors in the criminal justice system: the case of battered immigrant women" (Rashmee Singh, 2012)
- 12) "The regulation of suicide in India: law, medicine, and beyond" (Meghana Rao, 2017)

- One co-supervision at the Faculty of Law (Kyle Kirkup) – finished 2016
- Three co-supervisions, Sociology, York University (1988-92)
- One in Social and Political Thought, York

(B) Completed PhD dissertations in which I was a committee member

- Gavin Sullivan, University of Amsterdam Political Science, 2017 ("The law of the list – on UN terrorism listing)
- History U of T (Dale Barbour, 2018)
- East Asian Studies (Gang Pan, 2014)
- two at the Faculty of Law (Luis Campos, 2014, Hilary Cameron 2015)
- two in Political Science, York University (William Walters; Margaret Little)
- two in Social Work, Univ. of Toronto (Carol-Anne O'Brien; Xiaobei Chen)
- three in History, Univ. of Toronto (Barrington Walker, Catherine Carstairs, Mike Pettit)
- 9 in Criminology (Nicole Myers, Annmarie Barnes, Jennifer Wood, Stephane Leman-Langlois, Kim Varma, Renisa Mawani, Kimberley White-Mair, Bryan Hogeveen, Mary-M Valverde, Curriculum Vitae

Lynn Young)

- two in Law, Univ. of Toronto (Jo-Anne Pickel 2003, Irus Braverman 2007)
- one in Geography, U of T (Lisa Freeman, 2012)
- one in Political Science, U of T (Zoe Adamson, 2005)

(C) Current PhD students under my supervision

At the Centre of Criminology:

- Andrea Sterling: sex work and law reform in Canada (started 2016)
- Brenna Keatinge. Topic: Urban farming and the problem of 'vacancy' in US cities
- Jordana Wright. Topic: Low-rent high-rises; regulation and experience
- Mayana Slobodian: Topic: Canadian state formation and inquiries into aboriginal 'problems'
- Jacqueline Briggs: Topic: Self-government and the disappearance of the 'Indian agent'

(D) Current PhD students for which I am a committee member

- Kerri Scheer and David Galano, Sociology
- Mercedes Cavallo and Patrick Garon, Law school (SJD)

(E) Completed MA supervisions

- Three at York University, Sociology [1990-92]
- One in Social and Political Thought [1991]
- 16 in Criminology:
 - Teresa Sarkesian; Ian Baird; Dawn Moore [all before 2000]; Paddy Stamp (2001), Miomir Cirak (2005), Miriam Parrish (2004), Bart Sarsh (2005), Sarah Lamble (2006), Anita Lam (2006)[Lam was co-supervised]; Arvin Gupta and Katherine Rudzinski (2007), Christopher Bourke (2008), Meghana Rao (2009), Sunny Dhillon (2011, Sarah Larock (2012); Sunny Dhillon (2012), Jessica Templeman (2013); Andrea Sterling (2015)

(F) Post-doctoral fellows supervision

Completed: Debi Brock; Becki Ross; Joe Hermer; Kevin Walby (all SSHRC post-docs).

TAB 9

Court File No.: CV-18-00603633-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**CHRIS MOISE and ISH ADERONMU and PRABHA KHOSLA on her own behalf and on
behalf of all members of Women Win Toronto**

Applicants

- and -

ATTORNEY GENERAL OF ONTARIO

Respondent

APPLICATION under Rule 14.05(3)(g.1) of the *Rules of Civil Procedure*, RRO 1990, Reg 194

ACKNOWLEDGEMENT OF EXPERT'S DUTY

1. My name is Mariana Valverde. I live at Toronto, in the Province of Ontario.
2. I have been engaged by or on behalf of the Applicants 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 on whose behalf I am engaged.

Date:

Aug 20, 2018

M Valverde
Mariana Valverde

TAB 10

Court File No.: CV-18-00603633-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**CHRIS MOISE, ISH ADERONMU and PRABHA KHOLSA on her own behalf and on
behalf of WOMEN WIN TO**

Applicants

- and -

**ATTORNEY GENERAL OF ONTARIO and
THE CORPORATION OF THE CITY OF TORONTO**

Respondents

APPLICATION under Rule 14.05(3)(g.1) of the *Rules of Civil Procedure*, RRO 1990, Reg 194

**AFFIDAVIT OF MOYA BEALL
(Sworn August 21, 2018)**

I, Moya Beall, of the City of Toronto, **MAKE OATH AND SAY:**

1. I am a resident of the City of Toronto. I live in the Kingston Road and Warden Avenue area. I am also a transit activist. For these reasons, I have direct knowledge of the matters to which I depose in this affidavit. Where the information in this affidavit is not based on my direct knowledge, but is based upon information and belief from other sources, I have stated the source of that information and I believe the information to be true.

Background

2. I have lived in Scarborough since 1991. The area I live in is currently part of Ward 36 -- Scarborough Southwest, and is represented by City Councillor Gary Crawford.

3. I have been involved in municipal politics as an activist over the past 3 years. Some issues I have been engaged with include climate change, budget deliberations and public transit. My involvement in municipal issues has included expressing myself publicly at municipal deputations, attending community meetings, and participating in grassroots community organizing.

4. I have voted in past municipal elections, and I intend to vote in the 2018 Toronto municipal election, and to encourage other electors, especially in Scarborough, to vote as well.

Transit Activism and Transit Issues Affecting Scarborough

5. As a long-time member of the Scarborough community and as transit activist, I am well versed in the two major future transit options for Toronto Transit Commission (“TTC”) service in Scarborough: the Light Rail Transit (“LRT”) network and the Scarborough Subway Extension.

6. The LRT network, as I understand it, would serve college and university campuses in Scarborough, as well as outer neighbourhoods in Southeast and Northeast Scarborough that are not currently well-served by the TTC. The Scarborough Subway Extension, however, would only extend the current Bloor-Danforth subway line by one stop. Furthermore, the existing Line 3 Scarborough (also known as Rapid Transit) stops would cease operation. Such a closure would result in 11,000 daily riders losing their access to transit.

7. I believe that the LRT network is a superior transit option for Scarborough. Through my activism, I work to inform Scarborough residents about these two options and the shutdown of Line 3 Scarborough if the Scarborough Subway Extension is built.

Scarborough City Councillors Support the Subway Extension

8. I support implementing the Scarborough Malvern LRT, or its more recent iteration, the Eglinton East LRT, and implementing the Sheppard East LRT and the Scarborough LRT to replace the aging Scarborough RT. Most Toronto city councillors representing wards in Scarborough actively and vigorously oppose any form of LRT in Scarborough. Scarborough's city councillors overwhelmingly support a one-stop subway extension. John Tory, the current mayor of Toronto, also supports the subway extension. To my knowledge, the only current Scarborough councillor who opposes the subway extension and favours LRT options in Scarborough is Councillor Paul Ainslie, who currently represents Ward 43, Scarborough East.

9. The nine Scarborough city councillors who have publicly supported a subway extension are:

- (a) Ward 35 – Michelle Holland
- (b) Ward 36 – Gary Crawford
- (c) Ward 37 – Michael Thompson
- (d) Ward 38 – Glen DeBaermaeker
- (e) Ward 39 – Jim Karygiannis
- (f) Ward 40 – Norm Kelly

(g) Ward 41 – Chin Lee (until May 8, 2018)

(h) Ward 42 – Neethan Shan

(i) Ward 44 – Jim Hart

10. Migan Megardichian, the current Councillor for Ward 41, replaced Chin Lee on June 26, 2018. To my knowledge, Megardichian has not taken a public position on the Scarborough Subway Extension.

11. Of these councillors, only Glen DeBaermaker is not seeking re-election. Scarborough residents and political activists like me must therefore support challengers, rather than incumbents, if we want our views on the issue of public transit for Scarborough represented.

12. Since I support an LRT in Scarborough, I am also supporting the election of new, diverse, and transit-friendly voices to City Council. However, based on my prior experience as an elector and as a volunteer on several election campaigns, it is also my understanding and view that challengers face a number of difficulties as compared to incumbents, including access to resources (such as experienced campaign staff, volunteers, donors), and establishing name recognition.

Transit Activism in Association Scarborough Transit Action (“STA”)

13. Scarborough Transit Action (“STA”) is an unincorporated grassroots organization that is comprised of transit riders across Scarborough and broadly advocates for an LRT network. My work as a transit activist led me participate in STA public education and outreach events. In canvassing for STA, I frequently encountered Scarborough residents who did not

understand that the Scarborough Subway Extension would result in Line 3 Scarborough closing. In particular, last year, when surveying riders in the Lawrence East station area, I encountered multiple residents who did not understand that they would no longer be able to use the existing Rapid Transit stops once the subway stop is built. This experience helped to motivate me to support the election of transit-friendly councillors in Scarborough who will better communicate with constituents, and support accessible public transit.

14. As discussed further below, both in my personal capacity, and through my volunteer work with STA, I viewed the 2018 municipal election as a promising opportunity to elect city councillors who are transit-friendly, and who support an LRT Network in Scarborough over a subway extension.

Electing Women and Diverse Councillors in the 2018 Municipal Election

15. I have been excited about the prospect of diverse new voices representing Scarborough in Toronto's City Council in the 2018 municipal election. I was excited by the prospect of candidates who were more accountable to Scarborough's residents being elected.

16. Of the ten wards in Scarborough, only two wards are currently represented by women. My hopefulness about the 2018 municipal election was in part due to the expansion of City Council from 44 wards to 47 wards, which would have more evenly distributed, and reduced, the population in each ward in Scarborough. In my view, more even wards, and smaller populations in each ward, make it easier for women candidates and diverse candidates to challenge incumbents.

17. I was also particularly enthusiastic about the 2018 election because a number of women had come forward to run for city council in Scarborough. Some of these women who were running as candidates include: Cheryl Lewis-Thurab, and Felicia Samuel. I was encouraged by women running for City Council in Scarborough because I also saw them raising other issues that are important to the lives of Scarborough's women and children such as child care, poverty, and community safety. I believe these issues do not receive sufficient attention from current councillors.

18. My view of municipal elections, based on my past experience as a voter and my involvement in speaking to many electors as a result of political canvassing and my transit activism, is that many Scarborough residents do not vote in them. I hoped that based on the fresh new voices running for City Council, citizens would feel engaged with the important issues at stake in municipal elections – especially making transit more accessible, and less expensive.

Impact of Bill 5

Impact of Increased Ward Size on Diverse Candidates in Scarborough

19. With the collapse of municipal wards from 47 wards to 25 wards mirroring the provincial and federal electoral districts, I am concerned that many of the new voices I have seen engaging as candidates for city council will no longer be able to effectively advance their positions or have a reasonable chance of being elected.

20. I am concerned that by suddenly changing the ward boundaries, Bill 5 has made it more difficult for diverse city council candidates in Scarborough to run for election, and

imposed additional burdens on them because diverse candidates, women candidates, and first-time candidates, in my experience, have fewer resources to draw on, less name recognition, and less capacity to effectively reach out to larger geographic areas compared to incumbents. Incumbents enjoy name recognition, and are less likely to be from diverse backgrounds, and their campaigns also tend to have greater resources.

21. Bill 5 has led to candidates having to withdraw, or consider withdrawal because of the increased ward sizes, and their own limited resources and capacity to effectively campaign in these much larger wards in the limited time available late in the election period. By favouring incumbents, I fear that Bill 5 creates an unfair election playing field, and ensures that the status quo will remain in Scarborough.

Impact of Change in Ward Boundaries During the Election on Diverse Candidates in Scarborough

22. I am concerned that Bill 5 has made it much more difficult for potential diverse and progressive candidates in Scarborough to make effective inroads and engage the public because the new ward boundaries have been sprung on them with no notice and no public consultation. The change in ward boundaries particularly impacts women and diverse candidates, including first-time candidates, because they have fewer financial resources, and fewer campaign volunteers to draw upon to respond to the increase in the size of the new wards. In addition to size, however, there is also the impact of these candidates now having to campaign in areas that are not their home neighbourhoods where they have been building support in anticipation of the election. If not for Bill 5, in my view, there was a greater

likelihood for a new slate of diverse municipal councillors to be elected, including transit-friendly councillors.

Specific Impact of Bill 5 on a Campaign I Have Been Supporting

23. In the upcoming municipal election, I have been campaigning on behalf of Cheryl Lewis-Thurab in what is now Ward 45. Cheryl is a Black woman, and if elected, she would be the first Black woman to sit on Toronto City Council.

24. If the changes to ward boundaries proposed by Bill 5 are made, and wards in Scarborough are combined, Cheryl's limited resources may not permit her to campaign effectively in a different, and much larger riding where she faces barriers because she does not have previous relationships in that ward or name recognition. Another consideration is that she might be running against another progressive candidate, which could split the vote and result in no progressive or diverse candidate being elected. My understanding is that Cheryl is currently deciding whether or not she will remain in the election, or support another candidate in her new ward. In other words, if the Scarborough wards are combined, Cheryl may not run at all. In my view, it is very unfortunate for voters to lose the option of supporting candidates from diverse backgrounds like Cheryl, who is also the only Black woman running for council in that ward. Further, in my experience canvassing with Cheryl, I noticed that she was incredibly refreshing in her interactions with residents. She frequently sought the input of residents and asked for their opinions and views which made me very excited about the prospect of her being elected.

25. I have not been involved in the municipal election campaign in my own ward because the incumbent in my ward has a significant advantage over any potential diverse challengers. The current city councillor for my ward is Gary Crawford, who is the city's budget chief.

26. Because I did not believe a challenger had a good chance of unseating the incumbent councillor in my ward, and because I wanted to support diverse women candidates, I decided to dedicate my election efforts to support Cheryl's campaign. I am concerned that my efforts and political expression to date in support of Cheryl will have been for nothing because she may not be able to continue her race for Council in light of the challenges introduced by Bill 5.

27. It is my belief that voters' options for political expression will be reduced because candidates like Cheryl may not be able to continue their campaigns at all, or may not be able to effectively reach voters because of the additional demands placed on their campaigns. I felt that Scarborough's residents would benefit from the issues that candidates like Cheryl were bringing to the debate, which include: better transit, child care, poverty, and community safety. I hoped that, based on what I witnessed about Cheryl's campaign in particular, that she, and other candidates like her, would be able to bring different communities of people to the polling booths who (in my experience) are not usually participants in municipal elections.

28. I was hopeful, based on my observations of the municipal election campaign in May, June, and July of 2018 that the candidates I was supporting in Scarborough were finally engaging residents and educating them about the role that municipal politics plays in their

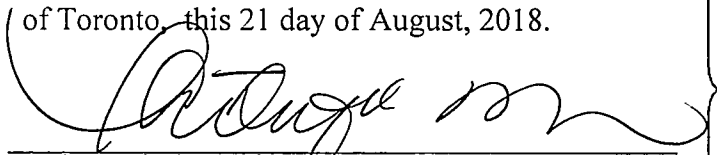
lives. These new diverse candidates, in my view, also helped residents realize that their lives could be improved through different municipal representation.

Impact of Bill 5 on my Personal Endorsements

29. I am also concerned that Bill 5 undermines the political associations and alliances made in Scarborough for the upcoming municipal elections because Bill 5 has created uncertainty about ward boundaries in the upcoming October election. Candidates who were co-ordinating their campaigns, and supporting each other's campaigns have now been pitted against one another. I cannot effectively support all of the candidates I previously endorsed in other wards, and this is damaging to the relationships I've developed as well as to the community as a whole going forward.

30. I swear this affidavit in support of the Applicants' application and for no other or improper purpose.

SWORN AFFIRMED BEFORE ME at the City
(of Toronto, this 21 day of August, 2018.


A Commissioner for taking Affidavits (or as may be)


MOYNA BEALL

**Janya Elizabeth Atherfold-Desliva, a
Commissioner, etc., Province of Ontario,
for Goldblatt Partners LLP, Barristers and
Solicitors. Expires September 8, 2018.**

TAB 11

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**CHRIS MOISE and ISH ADERONMU and PRABHA KHOSLA on her own behalf and
on behalf of all members of WOMEN WIN TO**

Applicants

- and -

**ATTORNEY GENERAL OF ONTARIO and
THE CORPORATION OF THE CITY OF TORONTO**

Respondents

APPLICATION under Rule 14.05(3)(g.1) of the *Rules of Civil Procedure*, RRO 1990, Reg 194

**AFFIDAVIT OF MEGANN WILSON
(Sworn August 21, 2018)**

I, Megann Wilson, of the City of Toronto, MAKE OATH AND SAY:

1. I am a resident of the City of Toronto. I am also a candidate in the 2018 Municipal Election and a participant in Women Win TO. For these reasons, I have direct knowledge of the matters to which I depose in this affidavit. Where the information in this affidavit is not based on my direct knowledge, but is based upon information and belief from other sources, I have stated the source of that information and I believe the information to be true.

Background

2. I currently live in downtown Toronto in Ward 23 (under the 47 ward structure). I have lived in this ward since 2015. I regularly voted in past municipal elections, and it is also my intention to vote in the 2018 municipal election.

My Decision to Run as a City Councillor

My Involvement with the Regent Park Neighbourhood Association

3. I am an Interim Leadership Co-Chair of the Regent Park Neighbourhood Association (“RPNA”) which was formed in 2016-2017. The governance structure of the RPNA is based on each residential building, or group of townhouses, electing a number of delegates which is determined by the building’s size. In total there are 62 delegates from across Regent Park and the delegates meet four times a year. In May 2017, the delegates elected a leadership team of ten people. Of those ten people, the RPNA requires that 50% be from Toronto Community Housing buildings, and that 50% be from market buildings such as condos, rentals or co-ops. Regardless of whether they are delegates, all neighbourhood residents are able to participate in the various action groups of the RPNA which include Advocacy, Communications and Community Building.

4. My involvement with the RPNA motivated me to run for municipal office. I was particularly inspired by the governance structure of the RPNA and the organization’s commitment to ensuring that the diverse voices of the original residents of Regent Park continue to be heard. Based on my experiences with the RPNA, I was inspired to seek to replicate the collective and collaborative style of governance at the RPNA at higher levels of municipal governance.

Decision to Run in Ward 23

5. I started thinking about running in Ward 23 when Councillor Pam McConnell passed away in July 2017. Councillor McConnell was the councillor for Ward 28, which became

Ward 23 after the City of Toronto's Ward Boundary Review. Despite Councillor McConnell's death, a new councillor was not appointed until November 2, 2017 when Lucy Troisi was appointed after a vote in City Council.

6. Because no new councillor had been appointed to fill the vacancy in Councillor McConnell's seat, I started thinking strongly about the need for someone to step forward to run in the ward in the upcoming 2018 municipal election. At the same time that I was forming my intention to run in the 2018 municipal election, I heard about a program called Women Win TO, which I discuss further below.

My Participation in WWTO

7. Women Win TO ("WWTO") is a program training and preparing women, trans, and gender non-conforming individuals of diverse backgrounds to run for municipal office. WWTO's purpose is to increase representation by diverse and underrepresented women on City Council, particularly due to the challenges these groups face when running for municipal office. WWTO seeks to counteract the systemic barriers diverse women face as candidates such as the lack of access to mentorship and information about the 'ins and outs' of City Council. From my understanding, WWTO is a volunteer-driven organization that operated with a minimal budget. I was encouraged to apply to participate in WWTO by several community members. In order to participate in WWTO I had to make an application, and provide endorsements from community members. I applied in the summer of 2017, and began training when the program commenced in September 2017.

8. As a participant in WWTO I learned how to run a winning campaign through targeted workshops regarding the specific areas candidates need to succeed at in order to be elected.

These workshops included sessions on crafting a narrative, building a campaign team, leading fundraising initiatives, stakeholder engagement, media and communications, data management, as well as health and well-being on the campaign trail. As a WWTO participant, I was able to gain access to an organizational structure and gain vital knowledge about campaigning which I believe most first-time candidates, especially diverse women, would not otherwise have access to.

9. In addition to the training that we participated in at WWTO, I was also able to make meaningful connections with women candidates across the city. I was confident that together we would be able to bring more democratic and representative leadership to municipal politics, especially by taking into account the needs of diverse women. For example, WWTO allowed me to connect with a WWTO participant and City Council candidate in Scarborough. This connection gave me insight into how City policies and programs affect women in Scarborough, especially with respect to public transit issues. I also felt more confident in my candidacy because I had the network and support of WWTO to draw upon, and knew that diverse women around the City were working together towards our shared collective goals of increased representation for diverse women. Having already been aware that women currently face barriers to accessing public office in the City, the connections I made with the diverse participants of WWTO made me feel very confident that together we would be able to change the direction, priorities, and face, of municipal politics in Toronto. I was confident that if elected alongside the other vibrant, committed candidates who participated in WWTO, that I would be able to effect positive change for the residents of my ward.

Preparation for My Election Campaign

10. In order to ensure that I could run an effective campaign I knew that I needed to be well-prepared, have sufficient financial resources, and put together a campaign team. As a small business owner I prepared to take time off from running my business. Since I run my business with my husband, and we are effectively a two-person operation, my decision to take time away from the business for six months in order to campaign was a serious decision that my husband and I spent several months contemplating. I stopped working in my business on May 1st, 2018, and began actively campaigning on that date. I had been preparing to run since the fall of 2017.

11. I knew that as a first-time candidate I would need as much time as I could get to get my name, and candidacy before voters. Consequently, I registered as a candidate in Ward 23 on May 1, 2018, the first day that nominations opened. Since that date, I have not been involved in my business, nor have I drawn an income from it because I have been entirely focused on my campaign. I have focused on canvassing the ward, meeting residents, building connections, building my campaign team, and fundraising for my campaign.

The Impact of Changing the Boundaries During the Election Campaign on My Campaign

12. Bill 5 made it much more difficult for me to reach out to voters regarding the substantive local issues I had planned my campaign and candidacy around. Under the 47-ward model I was campaigning in Ward 23, and under the 25-ward model, I will be campaigning in Ward 13. The most recent, and sudden, change to the ward boundaries under Bill 5 has caused a lot of confusion in the ward where I am running. This is because the change was made

without any consultation or warning, and because the change was made after the election period had already commenced. Candidates like myself were actively canvassing with campaign literature based on the ward being known as Ward 23, and residents are, understandably, very confused about this change to the ward boundaries. I believe that residents reasonably expected that the ward boundaries in place at the commencement of the election campaign would be those used for the election, and the sudden change to those boundaries has proven very distracting for residents, and in my experience, for candidates.

13. Since Bill 5 and the imposition of a 25-ward model, I have struggled to engage with residents on my platform, or key issues and policies in the ward. Many residents are simply tired of the changing wards, and no longer know what ward they live in – and that is what I spend my time talking to residents about when I am canvassing. In my view, the level of confusion in my ward will make it more difficult for voters to make a good decision about what candidate to vote for since electors are not even aware of what ward they now live in let alone who the candidates are, given the sudden changes. Further, as a result of lack of communication to residents about the new ward boundaries, I have found myself having to fill that gap while canvassing residents – a significant distraction from the municipal issues I am trying to engage residents about.

14. As a result of Bill 5 I am hindered in getting to the root of municipal issues affecting electors while I am canvassing. I am now spending most of my time with voters explaining the changes to the ward boundaries, and discussing the provincial politics that led to these sudden changes. Time with prospective voters is precious for all candidates and Bill 5 has interrupted my ability to engage directly with voters about my platform and my ideas for the ward and its residents.

15. As candidates we all have constraints on the amount of time we can spend canvassing and the extent to which we can effectively engage with voters. Although I had planned how to canvass my ward, and was on target for the amount of households I wanted to canvass, Bill 5 has significantly interfered with my ability to engage with residents. This interference is compounded by the fact that there are many new condominium and apartment buildings in my ward. In order to engage with voters in those buildings, I have to physically canvass the buildings because these voters are new to the wards and are not on voter's lists from the last municipal election. While I was previously very positive about my campaign's ability to canvass the ward and engage with voters, and although I have continued canvassing, I am now very worried about the impact of Bill 5 on my ability to engage voters.

Responding to Residents' Confusion Disadvantages Non-Incumbents

16. The confusion that residents have demonstrated about ward boundaries as a result of Bill 5 only serves to benefit incumbents and disadvantage first-time candidates like myself. I am also aware that most incumbents to City Council are men. Incumbents enjoy name recognition and already have lists of constituents that they engage with and report to on local issues or constituents' needs. It is much easier for incumbents to use their existing resources, as City Councillors, to reach out to residents, based on the contact information they have for them.

17. In addition to the name recognition that incumbents enjoy, it is my understanding that City Council also recently voted on July 23rd to allow incumbent councillors to continue to use communication resources until August 31st since Bill 5 postponed nomination day until September 14, 2018. The City Council motion on July 23rd, which passed stated:

5. In the event Nomination Day is changed, City Council amend the Constituency Services and Office Budget Policy to add the following:

Notwithstanding section 5.1.1 of the Use of City Resources during an Election Period Policy, City Council shift the cut-off date for Councillor communications from August 1, 2018 to August 31, 2018 or one week prior to Nomination Day whichever is later due to the change in date of nomination day.

A copy of the City Council Decision is attached to this affidavit as **Exhibit "A"**.

18. Typically, based on the rules that were previously in place, councillors would not have been permitted to continue to use their office budgets for such activities, including events with constituents and communications with constituents, after August 1st because they could be construed as electioneering or campaigning. A copy of the City of Toronto's 'Use of City Resources during an Election Period Policy' is attached to this affidavit and marked as **Exhibit "B"**.

19. However, because Bill 5 changed the Nomination Day for the municipal election, incumbent councillors will continue to be able to use city resources until less than two months before the election. This means that incumbent City Councillors can use city resources to hold community meetings, including using space in City community centres for town hall meetings. Although these advantages existed for incumbents before Bill 5, Bill 5 has interfered with the usual election timelines by extending incumbents' advantages, and adding to the disadvantages that first-time candidates face. I am concerned that this change will have a disproportionate impact on women and people of colour who are first-time candidates. As a participant in Women Win TO, I am concerned that all the participants in the program, as

non-incumbents, are now being disadvantaged as a result of Bill 5 and the way it has interfered with the normal election processes and timelines.

Changes Have Created Uncertainty About the Viability of My Candidacy

20. As a result of Bill 5, I am currently running against one of my mentors from Women Win TO, Councillor Kristyn Wong-Tam. I originally selected the ward I was running in based on my community connections, as well as the fact that there was no elected incumbent City Councillor in the ward. Now, not only am I running against an elected incumbent, I am running against a City Councillor who shares many of the policy priorities that I was seeking to bring to the ward. Consequently, my team and I have had to seriously re-evaluate the viability of my candidacy, and develop a pivot strategy. I am concerned that all the work that I have done to date, and all the sacrifices I have made for my campaign, including the financial resources I put into my campaign and the fundraising I conducted will be for naught because of Bill 5's interference in an ongoing election.

Impact of the Creation of Larger Wards


21. The preliminary maximum campaign expense limit provided to me by the City Clerk when I registered on May 1st, was based on 25,838 electors. Unfortunately, because of the rushed timelines, I am also not aware of any official figures regarding the population of eligible municipal voters in my ward; I will not be provided an updated number of electors until I provide written notice to the Clerk that I will continue to run, however the number will be significantly higher. The new Ward is mainly comprised of the prior (2014) Wards 27 and 28. On the City's website, data from the 2014 election shows 53,167 voters in Ward 27, and 43,765 in Ward 28. Increasing the population of a ward means that electoral spending limits


will also increase. While the spending limit for my ward was previously around \$26,900 (provided to me by the City Clerk), it will now be in the range of \$87,000, based on adding the two Ward voter counts from 2014 and using the formula of \$5,000 plus \$0.85 per elector. Even though we are so close to the October 22nd election, as a result of Bill 5, the spending limit will only be confirmed when I submit my written intention to continue running.

22. While I was previously confident that I could meet raise enough funds to mount an effective campaign, I am now concerned about my ability to compete with other candidates because of the larger ward size and significantly increased spending limits. My reasons for running for city council were to support community voices and I know that many of my supporters will struggle to donate more than they have already donated to my campaign. While the maximum donation that can be made to a campaign is \$1200, many of my supporters cannot donate anywhere close to that amount as they are having trouble paying their mortgages and rent, and some residents in my ward are even accessing food banks. As a result I cannot now effectively go back to the same supporters to get more funds to re-print campaign materials based on the different ward boundaries and larger ward size. I believe that the campaigns that struggle to adjust to the sudden change in the ward boundaries are those that are supported by diverse community members, low-income, and other groups that are underserved, and underrepresented in local politics, and municipal governance. I am concerned that by increasing the size of the ward mid-campaign, the diverse voices of residents in my ward may not be represented at City Council because the voters and residents of Regent Park, where I live, will make up a smaller proportion of the ward in the new system – meaning their voices will be diluted.

23. I swear this affidavit in support of the Applicants' application and for no other or improper purpose.

SWORN AFFIRMED BEFORE ME at the City of Toronto, Ontario this 21st day of August, 2018.



A Commissioner for taking Affidavits (or as may be)


Megann Willson

Tanya Elizabeth Atherfold-Desilva, a Commissioner, etc., Province of Ontario, for Goldblatt Partners LLP, Barristers and Solicitors. Expires September 8, 2018.

EXHIBIT “A”



This is Exhibit "A" referred to in the
 affidavit of MEGANN WILSON
 sworn before me, this 21st
 day of AUGUST 2018

 A COMMISSIONER, ETC.
 Tanya Elizabeth Atherfold-Desilva, a
 Commissioner, etc., Province of Ontario
 for Goldblatt Partners LLP, Barristers and
 Solicitors. Expires September 8, 2018

Tracking Status

- City Council adopted this item on July 23, 2018 with amendments.

City Council consideration on July 23, 2018

MM44.128	ACTION	Amended		
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Urgent Consideration of the Provincial Government's Plan to Reduce the Size of City Council - by Mayor John Tory, seconded by Councillor Mary-Margaret McMahon

City Council Decision

City Council on July 23, 24, 25, 26, 27 and 30, 2018, adopted the following:

1. City Council convey its opposition to the Provincial government's intention to introduce legislation to reduce the size of City Council to 25 Councillors and a Mayor.
2. City Council request the Province of Ontario to conduct a binding referendum on the number and boundaries of wards before proceeding with the legislation.
3. If the Province does not conduct the referendum requested in Part 2 above, City Council urge the Province to amend the Municipal Elections Act or regulations thereunder to permit the City to put a question on the ballot in 2018 on the proposed reduction in the number of wards and Members of Council before the Province proceeds with the legislation.
4. City Council exempt the City Clerk from any established City policies and procedures or any part of an established City policy or procedure related to procurement, human resources, budget and information technology that the City Clerk believes is necessary or desirable in order to conduct the Toronto election.
5. In the event Nomination Day is changed, City Council amend the Constituency Services and Office Budget Policy to add the following:

Notwithstanding section 5.1.1 of the Use of City Resources during an Election Period Policy, City Council shift the cut-off date for Councillor communications from August 1, 2018 to August 31, 2018 or one week prior to Nomination Day whichever is later due to the change in date of nomination day.

6. City Council request the City Solicitor to consider the validity and constitutionality of any Provincial legislation, including its potential violation of the rights of the citizens of Toronto to fair and effective representation, the practicality of conducting the election, the City Clerk's capacity to implement the changes, and any errors or flaws in the legislation and to report back to City Council at a special meeting to be held on Monday, August 20, 2018 with options for City Council's consideration.

Background Information (City Council)

Member Motion MM44.128

<http://www.toronto.ca/legdocs/mmis/2018/mm/bgrd/backgroundfile-119545.pdf>

Communications (City Council)

(July 27, 2018) Submission from Councillor Gord Perks, Ward 14 - Backgrounder on The Better Local Government Act (MM.New.MM44.128.1)

<http://www.toronto.ca/legdocs/mmis/2018/mm/comm/communicationfile-87138.pdf>

(July 27, 2018) Submission from the City Clerk - Summary of election activities (MM.New.MM44.128.2)

<http://www.toronto.ca/legdocs/mmis/2018/mm/comm/communicationfile-87157.pdf>

(July 29, 2018) E-mail from Julie Beddoes (MM.New.MM44.128.3)

(July 30, 2018) Submission from Councillor Paula Fletcher, Ward 30 - How does Toronto's Council size compare? (MM.New.MM44.128.4)

<http://www.toronto.ca/legdocs/mmis/2018/mm/comm/communicationfile-87178.pdf>

(July 30, 2018) Submission from Councillor Paula Fletcher, Ward 30 - extract of Council minutes on Item EX18.2 (MM.New.MM44.128.5)

<http://www.toronto.ca/legdocs/mmis/2018/mm/comm/communicationfile-87179.pdf>

Motions (City Council)

Motion to Introduce Motion without Notice moved by Mayor John Tory (Carried)

That Mayor John Tory be permitted to add to the agenda of today's meeting an urgent Motion without Notice concerning:

Urgent Consideration of the Provincial Government's Plan to Reduce the Size of City Council

Reason for Urgency:

This Motion is urgent as City Council must consider a response to the Provincial announcement as soon as possible.

Vote (Introduce Motion without Notice)

Jul-27-2018 9:46 AM

Result: Carried	Two-Thirds full Council Required - Add urgent motion - Tory
Yes: 34	Paul Ainslie, Maria Augimeri, Ana Bailão, Jon Burnside, John Campbell, Christin Carmichael Greb, Gary Crawford, Joe Cressy, Janet Davis, Glenn De Baeremaeker, Frank Di Giorgio, Sarah Doucette, John Fillion, Paula Fletcher, Mary Fragedakis, Jim Hart, Michelle Holland, Norman Kelly, Mike Layton, Josh Matlow, Mary-Margaret McMahan, Miganoush Megardichian,

	Joe Mihevc, Denzil Minnan-Wong, Frances Nunziata (Chair), Gord Perks, Jaye Robinson, Neethan Shan, David Shiner, Michael Thompson, John Tory, Lucy Troisi, Jonathan Tsao, Kristyn Wong-Tam
No: 1	Stephen Holyday
Absent: 10	Josh Colle, Vincent Crisanti, Justin J. Di Ciano, Michael Ford, Mark Grimes, Jim Karygiannis, Giorgio Mammoliti, Cesar Palacio, James Pasternak, Anthony Perruzza

1a - Motion to Amend Item (Additional) moved by Mayor John Tory (Amended)

That:

1. City Council request the Province of Ontario to conduct a binding referendum on the number and boundaries of wards before proceeding with the proposed legislation.
2. If the Province does not conduct the referendum, City Council urge the Province to amend the Municipal Elections Act or regulations thereunder to permit the City to put a question on the ballot in 2018 on the proposed reduction in the number of wards and Members of Council.

Part 2 of motion 1a by Mayor Tory was amended by motion 5 by Councillor Doucette.

Vote (Amend Item (Additional))

Jul-30-2018 4:42 PM

Result: Carried	Majority Required - MM44.128 - Tory - motion 1a, as amended
Yes: 28	Paul Ainslie, Maria Augimeri, Ana Bailão, Jon Burnside, John Campbell, Christin Carmichael Greb, Josh Colle, Gary Crawford, Joe Cressy, Glenn De Baeremaeker, Frank Di Giorgio, Sarah Doucette, John Fillion, Paula Fletcher, Mark Grimes, Jim Hart, Michelle Holland, Norman Kelly, Mary-Margaret McMahon, Miganoush Megardichian, Joe Mihevc, Denzil Minnan-Wong, Frances Nunziata (Chair), James Pasternak, Jaye Robinson, John Tory, Lucy Troisi, Jonathan Tsao
No: 13	Vincent Crisanti, Janet Davis, Justin J. Di Ciano, Michael Ford, Stephen Holyday, Mike Layton, Giorgio Mammoliti, Cesar Palacio, Gord Perks, Neethan Shan, David Shiner, Michael Thompson, Kristyn Wong-Tam
Absent: 4	Mary Fragedakis, Jim Karygiannis, Josh Matlow, Anthony Perruzza

1b - Motion to Amend Item (Additional) moved by Mayor John Tory (Carried)

That:

City Council exempt the City Clerk from any established City policies and procedures or any part of an established City policy or procedure related to procurement, human resources, budget and information technology that the City Clerk believes is necessary or desirable in order to conduct the Toronto election.

Vote (Amend Item (Additional))

Jul-30-2018 4:43 PM

294

Result: Carried	Majority Required - MM44.128 - Tory - motion 1b
Yes: 41	Paul Ainslie, Maria Augimeri, Ana Bailão, Jon Burnside, John Campbell, Christin Carmichael Greb, Josh Colle, Gary Crawford, Joe Cressy, Vincent Crisanti, Janet Davis, Glenn De Baeremaeker, Justin J. Di Ciano, Frank Di Giorgio, Sarah Doucette, John Fillion, Paula Fletcher, Michael Ford, Mark Grimes, Jim Hart, Michelle Holland, Stephen Holyday, Norman Kelly, Mike Layton, Giorgio Mammoliti, Mary-Margaret McMahon, Miganoush Megardichian, Joe Mihevc, Denzil Minnan-Wong, Frances Nunziata (Chair), Cesar Palacio, James Pasternak, Gord Perks, Jaye Robinson, Neethan Shan, David Shiner, Michael Thompson, John Tory, Lucy Troisi, Jonathan Tsao, Kristyn Wong-Tam
No: 0	
Absent: 4	Mary Fragedakis, Jim Karygiannis, Josh Matlow, Anthony Perruzza

2a - Motion to Amend Item (Additional) moved by Councillor Joe Cressy (Carried)

That City Council convey its opposition to the Provincial government's intention to introduce legislation to reduce the size of City Council to 25 Councillors and a Mayor.

Vote (Amend Item (Additional))

Jul-30-2018 4:44 PM

Result: Carried	Majority Required - MM44.128 - Cressy- motion 2a
Yes: 24	Paul Ainslie, Maria Augimeri, Ana Bailão, Jon Burnside, John Campbell, Christin Carmichael Greb, Josh Colle, Joe Cressy, Janet Davis, Sarah Doucette, John Fillion, Paula Fletcher, Jim Hart, Mike Layton, Mary-Margaret McMahon, Miganoush Megardichian, Joe Mihevc, James Pasternak, Gord Perks, Neethan Shan, John Tory, Lucy Troisi, Jonathan Tsao, Kristyn Wong-Tam
No: 17	Gary Crawford, Vincent Crisanti, Glenn De Baeremaeker, Justin J. Di Ciano, Frank Di Giorgio, Michael Ford, Mark Grimes, Michelle Holland, Stephen Holyday, Norman Kelly, Giorgio Mammoliti, Denzil Minnan-Wong, Frances Nunziata (Chair), Cesar Palacio, Jaye Robinson, David Shiner, Michael Thompson
Absent: 4	Mary Fragedakis, Jim Karygiannis, Josh Matlow, Anthony Perruzza

2b - Motion to Amend Item (Additional) moved by Councillor Joe Cressy (Withdrawn)

That City Council direct the City Solicitor to undertake legal action against the proposed legislation to reduce the size of City Council to 25 Councillors and a Mayor.

Motion to Withdraw a Motion moved by Councillor Joe Cressy (Carried)

That Councillor Cressy be permitted to withdraw his motion 2b.

3 - Motion to Amend Item (Additional) moved by Councillor Joe Mihevc (Carried)

That:

In the event Nomination Day is changed, City Council amend the Constituency Services and Office Budget Policy to add the following:

Notwithstanding section 5.1.1 of the Use of City Resources during an Election Period Policy, City Council shift the cut-off date for Councillor communications from August 1, 2018 to August 31, 2018 or one week prior to Nomination Day whichever is later due to the change in date of nomination day.

Vote (Amend Item (Additional))

Jul-30-2018 4:45 PM

Result: Carried	Majority Required - MM44.128 - Mihevc - motion 3
Yes: 26	Paul Ainslie, Maria Augimeri, Jon Burnside, Christin Carmichael Greb, Joe Cressy, Vincent Crisanti, Glenn De Baeremaeker, Sarah Doucette, John Fillion, Paula Fletcher, Jim Hart, Michelle Holland, Norman Kelly, Mike Layton, Giorgio Mammoliti, Mary-Margaret McMahon, Miganoush Megardichian, Joe Mihevc, Denzil Minnan-Wong, Frances Nunziata (Chair), Cesar Palacio, Gord Perks, Jaye Robinson, John Tory, Lucy Troisi, Kristyn Wong-Tam
No: 15	Ana Bailão, John Campbell, Josh Colle, Gary Crawford, Janet Davis, Justin J. Di Ciano, Frank Di Giorgio, Michael Ford, Mark Grimes, Stephen Holyday, James Pasternak, Neethan Shan, David Shiner, Michael Thompson, Jonathan Tsao
Absent: 4	Mary Fragedakis, Jim Karygiannis, Josh Matlow, Anthony Perruzza

4 - Motion to Amend Item (Additional) moved by Councillor Paula Fletcher (Amended)

That City Council direct the City Solicitor to consider the validity and constitutionality of any provincial legislation, including its potential violation of the rights of the citizens of Toronto to fair and effective representation and to report back to City Council at a special meeting to be called by the Mayor before Labour Day with options for City Council's consideration.

Amended by motion 8 by Councillor Shan.

Vote (Amend Item (Additional))

Jul-30-2018 4:48 PM

Result: Carried	Majority Required - MM44.128 - Fletcher - motion 4 as amended
Yes: 32	Paul Ainslie, Maria Augimeri, Ana Bailão, Jon Burnside, John Campbell, Christin Carmichael Greb, Josh Colle, Joe Cressy, Janet Davis, Glenn De Baeremaeker, Sarah Doucette, John Fillion, Paula Fletcher, Mark Grimes, Jim Hart, Michelle Holland, Norman Kelly, Mike Layton, Mary-Margaret McMahon, Miganoush Megardichian, Joe Mihevc, Denzil Minnan-Wong,

	Frances Nunziata (Chair), Cesar Palacio, Gord Perks, Jaye Robinson, Neethan Shan, Michael Thompson, John Tory, Lucy Troisi, Jonathan Tsao, Kristyn Wong-Tam
No: 9	Gary Crawford, Vincent Crisanti, Justin J. Di Ciano, Frank Di Giorgio, Michael Ford, Stephen Holyday, Giorgio Mammoliti, James Pasternak, David Shiner
Absent: 4	Mary Fragedakis, Jim Karygiannis, Josh Matlow, Anthony Perruzza

5 - Motion to Amend Motion moved by Councillor Sarah Doucette (Carried)

That City Council amend Part 2 of motion 1a by the Mayor so that it now reads as follows:

2. If the Province does not conduct the referendum, City Council urge the Province to amend the Municipal Elections Act or regulations thereunder to permit the City to put a question on the ballot in 2018 on the proposed reduction in the number of wards and Members of Council before the Province proceeds with the proposed legislation.

Vote (Amend Motion)

Jul-30-2018 4:41 PM

Result: Carried	Majority Required - MM44.128 - Doucette - motion 5
Yes: 30	Paul Ainslie, Maria Augimeri, Ana Bailão, Jon Burnside, John Campbell, Christin Carmichael Greb, Josh Colle, Joe Cressy, Janet Davis, Glenn De Baeremaeker, Frank Di Giorgio, Sarah Doucette, John Filion, Paula Fletcher, Mark Grimes, Jim Hart, Michelle Holland, Mike Layton, Mary-Margaret McMahon, Miganoush Megardichian, Joe Mihevc, Denzil Minnan-Wong, Frances Nunziata (Chair), James Pasternak, Gord Perks, Jaye Robinson, Neethan Shan, John Tory, Jonathan Tsao, Kristyn Wong-Tam
No: 11	Gary Crawford, Vincent Crisanti, Justin J. Di Ciano, Michael Ford, Stephen Holyday, Norman Kelly, Giorgio Mammoliti, Cesar Palacio, David Shiner, Michael Thompson, Lucy Troisi
Absent: 4	Mary Fragedakis, Jim Karygiannis, Josh Matlow, Anthony Perruzza

6 - Motion to Amend Item (Additional) moved by Councillor Janet Davis (Out of Order)

That City Council request the City Clerk to maintain the current standards of accessibility to polling stations, advanced polling days, communications materials that meet our accessibility and language policies, and other electoral practices that fall within the jurisdiction of the City.

Ruling by Speaker Frances Nunziata (Upheld)

Speaker Nunziata ruled motion 6 out of order as under the Municipal Elections Act, the City Clerk exercises discretion to administer the election without interference from Council. Challenged by Councillor Janet Davis

Vote

Jul-27-2018 7:16 PM

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Result: Carried	Majority Required - MM44.128 - Uphold the Chair on ruling for motion 6
Yes: 21	Jon Burnside, Christin Carmichael Greb, Josh Colle, Gary Crawford, Vincent Crisanti, Justin J. Di Ciano, Frank Di Giorgio, Michael Ford, Mary Fragedakis, Jim Hart, Michelle Holland, Stephen Holyday, Norman Kelly, Giorgio Mammoliti, Denzil Minnan-Wong, Frances Nunziata (Chair), Cesar Palacio, Jaye Robinson, David Shiner, John Tory, Lucy Troisi
No: 16	Paul Ainslie, Maria Augimeri, Ana Bailão, Joe Cressy, Janet Davis, Sarah Doucette, Paula Fletcher, Mike Layton, Mary-Margaret McMahon, Joe Mihevc, Gord Perks, Anthony Perruzza, Neethan Shan, Michael Thompson, Jonathan Tsao, Kristyn Wong-Tam
Absent: 8	John Campbell, Glenn De Baeremaeker, John Filion, Mark Grimes, Jim Karygiannis, Josh Matlow, Miganoush Megardichian, James Pasternak

7 - *Motion to Amend Item (Additional) moved by Councillor Stephen Holyday (Redundant)*
 That City Council express its support to the Province to cut City Council to 25 Councillors and a Mayor.

Ruling by Speaker Frances Nunziata

Speaker Nunziata ruled motion 7 by Councillor Holyday redundant due to Council's adoption of motion 2a by Councillor Cressy.

8 - *Motion to Amend Motion moved by Councillor Neethan Shan (Carried)*

That City Council amend motion 4 by Councillor Fletcher so that it now reads as follows:

That City Council ~~direct~~ request the City Solicitor to consider the validity and constitutionality of any provincial legislation, including its potential violation of the rights of the citizens of Toronto to fair and effective representation, the practicality of conducting the election, the Clerk's capacity to implement the changes, and any errors or flaws in the legislation and to report back to City Council at a special meeting to be ~~called by the Mayor before Labour Day held on Monday, August 20, 2018~~ with options for City Council's consideration.

Vote (Amend Motion)

Jul-30-2018 4:47 PM

Result: Carried	Majority Required - MM44.128 - Shan motion 8
Yes: 31	Paul Ainslie, Maria Augimeri, Ana Bailão, Jon Burnside, John Campbell, Christin Carmichael Greb, Josh Colle, Joe Cressy, Janet Davis, Glenn De Baeremaeker, Sarah Doucette, John Filion, Paula Fletcher, Mark Grimes, Jim Hart, Norman Kelly, Mike Layton, Mary-Margaret McMahon, Miganoush Megardichian, Joe Mihevc, Denzil Minnan-Wong, Frances Nunziata (Chair), James Pasternak, Gord Perks, Jaye Robinson, Neethan Shan, Michael Thompson, John Tory, Lucy Troisi, Jonathan Tsao, Kristyn Wong-Tam
No: 10	Gary Crawford, Vincent Crisanti, Justin J. Di Ciano, Frank Di Giorgio, Michael Ford, Michelle Holland, Stephen Holyday, Giorgio Mammoliti, Cesar Palacio, David Shiner

Absent: 4	Mary Fragedakis, Jim Karygiannis, Josh Matlow, Anthony Perruzza
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9 - Motion to Amend Motion moved by Councillor Jim Karygiannis (Redundant)

That City Council amend motion 7 by Councillor Holyday so that it now reads as follows:

That City Council express its support to the Province to cut City Council to 25 Councillors and a Mayor and in the future to continue to mirror the number of Federal and Provincial ridings in Toronto.

Ruling by Speaker Frances Nunziata

Speaker Nunziata ruled motion 9 by Councillor Karygiannis redundant due to Council's adoption of motion 2a by Councillor Cressy.

10 - Motion to Amend Item (Additional) moved by Councillor Josh Colle (Withdrawn)

That City Council request that if the Province of Ontario cuts the number of City of Toronto Councillors to match the number of Federal/Provincial ridings, that the same principle be extended to all municipalities across the Province.

Motion to Withdraw a Motion moved by Councillor Josh Colle (Carried)

That Councillor Colle be permitted to withdraw his motion 10.

11 - Motion to Amend Motion moved by Councillor Justin J. Di Ciano (Out of Order)

That City Council amend motion 4 by Councillor Fletcher so that it now reads as follows:

That City Council direct the City Solicitor to consider the validity and constitutionality of any provincial legislation, including its potential violation of the rights of the citizens of Toronto to fair and effective representation, as well as a review of the constitutional process required, and the impacts of, the City of Toronto seceding from the Province of Ontario and to report back to City Council at a special meeting to be called by the Mayor before Labour Day with options for City Council's consideration.

Ruling by Speaker Frances Nunziata (Upheld)

Speaker Nunziata ruled motion 11 by Councillor Di Ciano out of order as his amendment to motion 4 by Councillor Fletcher was a distinct proposition, not an amendment. Challenged by Councillor Justin J. Di Ciano

Vote

Jul-30-2018 4:11 PM

Result: Carried	Majority Required - Uphold Chair on Councillor Di Ciano's challenge
Yes: 35	Paul Ainslie, Maria Augimeri, Ana Bailão, Jon Burnside, John Campbell, Christin Carmichael Greb, Josh Colle, Gary Crawford, Joe Cressy, Janet Davis, Glenn De Baeremaeker, Frank Di Giorgio, Sarah Doucette, John Fillion, Paula Fletcher, Jim Hart, Michelle Holland, Stephen Holyday, Norman Kelly, Mike Layton, Mary-Margaret McMahon, Miganoush Megardichian, Joe Mihevc, Denzil Minnan-Wong, Frances Nunziata (Chair), James Pasternak, Gord Perks, Anthony Perruzza, Jaye Robinson, Neethan

	Shan, Michael Thompson, John Tory, Lucy Troisi, Jonathan Tsao, Kristyn Wong-Tam
No: 7	Vincent Crisanti, Justin J. Di Ciano, Michael Ford, Mark Grimes, Giorgio Mammoliti, Cesar Palacio, David Shiner
Absent: 3	Mary Fragedakis, Jim Karygiannis, Josh Matlow

12 - Motion to Amend Motion moved by Councillor Jaye Robinson (Redundant)

That City Council amend motion 7 by Councillor Holyday so that it now reads as follows:

That City Council express its support to the Province to cut City Council to 25 Councillors and a Mayor, subject to the Province conducting a binding referendum.

Ruling by Speaker Frances Nunziata

Speaker Nunziata ruled motion 12 by Councillor Robinson redundant due to Council's adoption of motion 2a by Councillor Cressy.

Motion to Adopt Item as Amended (Carried)

Vote (Adopt Item as Amended)

Jul-30-2018 4:50 PM

Result: Carried	Majority Required - MM44.128 - Adopt the item as amended
Yes: 33	Paul Ainslie, Maria Augimeri, Ana Bailão, Jon Burnside, John Campbell, Christin Carmichael Greb, Josh Colle, Gary Crawford, Joe Cressy, Janet Davis, Glenn De Baeremaeker, Frank Di Giorgio, Sarah Doucette, John Fillion, Paula Fletcher, Mark Grimes, Jim Hart, Michelle Holland, Norman Kelly, Mike Layton, Mary-Margaret McMahon, Miganoush Megardichian, Joe Mihevc, Denzil Minnan-Wong, Frances Nunziata (Chair), James Pasternak, Gord Perks, Jaye Robinson, Neethan Shan, John Tory, Lucy Troisi, Jonathan Tsao, Kristyn Wong-Tam
No: 8	Vincent Crisanti, Justin J. Di Ciano, Michael Ford, Stephen Holyday, Giorgio Mammoliti, Cesar Palacio, David Shiner, Michael Thompson
Absent: 4	Mary Fragedakis, Jim Karygiannis, Josh Matlow, Anthony Perruzza

Vote (Adopt Item as Amended)

Jul-30-2018 4:53 PM

Result: Carried	Majority Required - MM44.128 - Adopt the item as amended - REVOTE
Yes: 33	Paul Ainslie, Maria Augimeri, Ana Bailão, Jon Burnside, John Campbell, Christin Carmichael Greb, Josh Colle, Joe Cressy, Janet Davis, Glenn De Baeremaeker, Frank Di Giorgio, Sarah Doucette, John Fillion, Paula Fletcher, Mark Grimes, Jim Hart, Michelle Holland, Norman Kelly, Mike Layton, Mary-Margaret McMahon, Miganoush Megardichian, Joe Mihevc, Denzil Minnan-Wong, Frances Nunziata (Chair), James Pasternak, Gord

	Perks, Jaye Robinson, Neethan Shan, Michael Thompson, John Tory, Lucy Troisi, Jonathan Tsao, Kristyn Wong-Tam
No: 8	Gary Crawford, Vincent Crisanti, Justin J. Di Ciano, Michael Ford, Stephen Holyday, Giorgio Mammoliti, Cesar Palacio, David Shiner
Absent: 4	Mary Fragedakis, Jim Karygiannis, Josh Matlow, Anthony Perruzza

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Motion to Reconsider Vote moved by Councillor Jonathan Tsao (Carried)

That in accordance with the provisions of Chapter 27, Council Procedures, City Council reconsider the vote on item as amended.

Point of Order by Councillor Gord Perks

Councillor Perks, rising on a Point of Order stated that he wished to place a motion to amend the Order Paper to consider the Mayor's urgent Member Motion first, as the nomination deadline for the municipal election closes at 2 p.m. on July 27, 2018.

Point of Order by Councillor Stephen Holyday

Councillor Holyday, rising on a Point of Order stated that it would be out of order to amend the Order Paper, as Council had already adopted the Order Paper.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Points of Order and ruled that Council had already adopted the Order Paper, and any change would require a two-thirds vote.

Point of Order by Councillor Paula Fletcher

Councillor Fletcher, rising on a Point of Order, stated that she wished to understand whether Councillor Perks' motion was to consider Motion MM44.128 as the first Item of business on July 27, 2018.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and ruled that, Councillor Perks had placed a motion to consider the Motion as the first Item of business.

Point of Order by Councillor Stephen Holyday

Councillor Holyday rising on a Point of Order, stated that he wished to understand whether Councillor Perks' motion to amend the Order Paper is out of order as the July 27, 2018 Order Paper was adopted.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and asked the City Clerk to respond. The City Clerk advised Council that Councillor Perks' motion to re-order the Order Paper is in order, but would require a two-thirds majority.

Point of Order by Councillor David Shiner

Councillor Shiner, rising on a Point of Order stated that he wished to understand why Council was voting to consider Motion MM44.128 first, when Members did not yet have a copy of it.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and ruled that Motion MM44.128 was currently being circulated to Members.

Point of Order by Councillor Jaye Robinson

Councillor Robinson, rising on a Point of Order, stated that she wished to understand why Council was considering re-ordering agenda to consider the Motion that was just introduced, as the Speaker had advised her that Council would continue with the agenda that was started on Day 1 of Council.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and ruled that she did advise Councillor Robinson that Council would continue with the agenda as set out in the July 27 Order Paper, but there was now a motion before Council to re-order the Order Paper.

Point of Order by Councillor Jaye Robinson

Councillor Robinson, rising on a Point of Order, stated that there were time-sensitive development Items remaining on the agenda, and she wished to know whether Council might run out of time to complete the agenda on Friday, July 27, 2018, as Council must recess before sundown.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and ruled that if Council did not complete the agenda on Friday, July 27, the meeting would resume on Monday, July 30.

Point of Order by Councillor Stephen Holyday

Councillor Holyday, rising on a Point of Order stated that he wished to know whether he could amend Councillor Perks' motion to amend the Order Paper.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and asked the City Clerk to respond. The City Clerk advised Council that Councillor Holyday would have to place his own motion.

Point of Order by Councillor David Shiner

Councillor Shiner, rising on a Point of Order stated that he wished to understand why Councillor Perks could speak on his motion to amend the Order Paper to consider Motion MM44.128 first for a second time.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and ruled that Councillor Perks could not speak on his motion for a second time, as he spoke when he introduced it.

Point of Order by Councillor Kristyn Wong-Tam

Councillor Wong-Tam, rising on a Point of Order, stated that she wished to know whether Members could question Mayor Tory while he is asking questions of staff.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and ruled that Members can only question the Mayor when they have the floor to question staff or after the Mayor has spoken.

Point of Privilege by Councillor Justin J. Di Ciano

Councillor Di Ciano, rising on a Point of Privilege, stated that as a Canadian, he has the fundamental right to appeal any decision made by any government and that Councillor Perks should not subvert that right.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Privilege and asked Councillor Perks to respond. Councillor Perks responded that he did not say that Councillor Di Ciano does not have the right to subvert a City Council or Ontario Municipal Board decision.

Point of Order by Deputy Mayor Denzil Minnan-Wong

Deputy Mayor Minnan-Wong, rising on a Point of Order, stated that he wished to propose that Council limit speakers and questions of the mover to 3 minutes per Member.

Ruling by Deputy Speaker Glenn De Baeremaeker

Deputy Speaker De Baeremaeker accepted the Point of Order and ruled that Council could not reduce the amount of time for speakers and questions of the mover, as speakers and questions of the mover had already begun.

Point of Order by Councillor Justin J. Di Ciano

Councillor Di Ciano, rising on a Point of Order stated that he wished to understand why Council was considering a motion to extend the meeting through the dinner recess, as he was previously informed that the meeting must recess to give City Clerk's Office staff a break.

Ruling by Deputy Speaker Glenn De Baeremaeker

Deputy Speaker De Baeremaeker accepted the Point of Order and ruled that Councillor Ford's motion to extend the meeting through the dinner recess is in order, and whether the motion passes or not is up to the will of Council.

Point of Order by Councillor Gord Perks

Councillor Perks, rising on a Point of Order, stated that he wished to understand whether Council would reconvene on Monday, July 30 if consideration of the item did not finish on Friday, July 27.

Ruling by Deputy Speaker Glenn De Baeremaeker

Deputy Speaker De Baeremaeker accepted the Point of Order and asked the Deputy City Clerk to respond. The Deputy City Clerk advised Council that the meeting would continue at 9:30 a.m. the next business day, which would be Monday, July 30, unless a motion is passed to reconvene at a different time.

Point of Order by Councillor Gord Perks

Councillor Perks, rising on a Point of Order, stated that he wished the Deputy City Clerk to clarify that Council cannot waive the rule to finish before 7:30 p.m. on Friday because of sundown.

Ruling by Deputy Speaker Glenn De Baeremaeker

Deputy Speaker De Baeremaeker accepted the Point of Order and asked the Deputy City Clerk

to respond. The Deputy City Clerk advised Council that the rule that Council must finish before sundown on Fridays is a policy, not a procedural rule, so Members could vote to continue past 7:30 p.m.

Point of Order by Councillor David Shiner

Councillor Shiner, rising on a Point of Order, stated that he wished to understand whether a motion to continue past 7:30 p.m. would require a two-thirds vote to pass.

Ruling by Deputy Speaker Glenn De Baeremaeker

Deputy Speaker De Baeremaeker accepted the Point of Order and ruled that it would require a two-thirds vote.

Point of Privilege by Councillor Giorgio Mammoliti

Councillor Mammoliti, rising on a Point of Privilege stated that Councillor Layton should withdraw his remark, as he had impugned Members' motives.

Ruling by Speaker Frances Nunziata

Speaker Nunziata, accepted the Point of Privilege and asked Councillor Layton to withdraw his remark as he was accusing Members of withholding information without being sure if they had.

Point of Privilege by Councillor Mike Layton

Councillor Layton stated that he would not withdraw his remark as Members had admitted they knew about the proposed legislation.

Point of Privilege by Mayor John Tory

Mayor Tory, rising on a Point of Privilege stated that he was honest about the information he had about the proposed legislation, and Councillor Layton should be ashamed of himself for calling his integrity into question.

Ruling by Speaker Frances Nunziata

Speaker Nunziata, accepted the Points of Privilege and ruled that she could not continue to recognize Points of Privilege on this item as the meeting must recess at 7:30 p.m. on a Friday.

Point of Privilege by Councillor Paula Fletcher

Councillor Fletcher, rising on a Point of Privilege, stated that she was offended by remarks by some Members that the Council meeting had 'dragged out' over 6 days, as Council had recessed a number of times out of respect and to permit Members to attend events related to the tragedy on Danforth Avenue the previous week.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Privilege and thanked Councillor Fletcher for her remarks.

Point of Privilege by Councillor Janet Davis

Councillor Davis, rising on a Point of Privilege, stated that Councillor Holyday should withdraw his remarks about other Members, as he is disparaging Councillors who were elected by the residents of their Wards to represent them at Council.

Point of Privilege by Councillor Stephen Holyday

Councillor Holyday, rising on a Point of Privilege stated that his job as a Member is to cast votes on every issue.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Points of Privilege and ruled that Councillor Holyday should keep his voice down and continue.

Point of Order by Councillor Paula Fletcher

Councillor Fletcher, rising on a Point of Order, stated that the Speaker should be neutral and Speaker Nunziata was at a press conference supporting the Province's legislation to reduce the size of Council, and while any Member has the right to do that, the Speaker must represent all Members of the Chamber and to deal with all questions on the item in a neutral way.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and ruled that her opinions have always been public.

Point of Order by Councillor Paula Fletcher

Councillor Fletcher, rising on a Point of Order, stated that the Speaker's role is to be neutral and to recognize that Members of Council have diverse opinions.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and ruled that she recognizes her role as a neutral Chair, which is why she tried to control both sides during the outburst at the meeting on Friday.

Point of Order by Councillor Paula Fletcher

Councillor Fletcher, rising on a Point of Order, stated that her remarks were directed at the overarching role of the Speaker to preside over the Chamber in a neutral manner.

Ruling by Speaker Paula Fletcher

Speaker Nunziata accepted the Point of Order and thanked Councillor Fletcher for her remarks.

Point of Order by Councillor Michael Ford

Councillor Ford, rising on a Point of Order, stated that if Councillor Fletcher has a concern with the Speaker's neutrality, she should give a specific example of the Speaker not being neutral.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and thanked Councillor Ford for his remarks.

Point of Order by Councillor John Campbell

Councillor Campbell, rising on a Point of Order, stated that he wished the Speaker to put an end to questions about Councillor Holyday's rationale for moving his motion 7, as opposed to questions of clarification about the content of his motion 7.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and ruled that Councillor Davis should only ask

Councillor Holyday questions of clarification about his motion 7.

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Point of Privilege by Councillor Giorgio Mammoliti

Councillor Mammoliti, rising on a Point of Privilege, stated that he gets cut-off for not asking Members questions of clarification about their motions, while Councillor Mihevc is being allowed to continue with his questions, and that he wished the Speaker to be fair to all Members.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Privilege and ruled that she tries to be fair, but is sometimes told that she is not.

Point of Privilege by Councillor Paula Fletcher

Councillor Fletcher, rising on a Point of Privilege, stated that she wished to correct Councillor Palacio's comment about the size of the municipal government in the City of Los Angeles, which has 15 Councillors in a metro organization, and 96 Councillors representing Neighbourhood Councils.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Privilege and thanked Councillor Fletcher for her remarks.

Point of Privilege by Councillor Stephen Holyday

Councillor Holyday, rising on a Point of Privilege, stated that Councillor McMahan should withdraw her remark that Etobicoke is "sleepy".

Point of Privilege by Councillor Justin J. Di Ciano

Councillor Di Ciano, rising on a Point of Privilege, stated that he also wished for Councillor McMahan to withdraw her remark about Etobicoke being "sleepy", as Etobicoke Lakeshore is the largest constituency in Canada, with large amounts of development, investment and industrial activity.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Points of Privilege and ruled that Councillor McMahan should withdraw her remark. Councillor McMahan withdrew her remark and stated that she meant that Etobicoke is a peaceful area.

Point of Order by Councillor Gord Perks

Councillor Perks, rising on a Point of Order stated that Councillor Di Ciano's proposed amendment to Councillor Fletcher's motion 4 should be ruled out of order, as it is a distinct proposition and not actually an amendment.

Ruling by Speaker Frances Nunziata

Speaker Nunziata accepted the Point of Order and ruled motion 11 by Councillor Di Ciano out of order.

Rulings (City Council)

Ruling by Speaker Frances Nunziata

Speaker Nunziata ruled that Councillor McMahon should only ask Councillor Holyday questions of clarification about his motion 7.

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Ruling by Speaker Frances Nunziata

Speaker Nunziata ruled that Councillor McMahon was not asking Councillor Holyday questions of clarification about his motion 7, so her time to question would be cut off.

Ruling by Speaker Frances Nunziata

Speaker Nunziata ruled that Councillor Shan should only ask Councillor Holyday questions of clarification about his motion 7.

Ruling by Speaker Frances Nunziata

Speaker Nunziata ruled that Councillor Mammoliti should only ask Councillor Holyday questions of clarification about his motion 7.

Ruling by Speaker Frances Nunziata

Speaker Nunziata ruled that Councillor Mammoliti should only ask Councillor Holyday questions of clarification about his motion, not questions about why he moved the motion 7.

Ruling by Speaker Frances Nunziata

Speaker Nunziata ruled that Councillor Perruzza should only ask Councillor Holyday questions of clarification about his motion 7.

Ruling by Speaker Frances Nunziata

Speaker Nunziata ruled that Councillor Mihevc should only ask Councillor Holyday questions of clarification about his motion 7.

Ruling by Speaker Frances Nunziata

Speaker Nunziata called Councillor Perruzza to order.

Ruling by Speaker Frances Nunziata

Speaker Nunziata again called Councillor Perruzza to order for his behaviour and ordered him to leave the Chamber. Councillor Perruzza subsequently apologized for his conduct and asked to remain in the Chamber. Speaker Nunziata ruled that Councillor Perruzza could remain in the Chamber if he did not interrupt other Members while speaking.

Source: Toronto City Clerk at www.toronto.ca/council

EXHIBIT “B”

Use of City Resources during an Election Period Policy

POLICY STATEMENT

This policy sets out provisions for the use of City facilities, resources and infrastructure during an election period, in order to preserve the public trust and integrity in the elections process and to comply with the Municipal Elections Act, 1996 ("Act"). This policy allows the City to balance the need for freedom of expression and assembly of candidates and its legal responsibility to ensure that no candidate, registered third party advertiser or political party is provided with an unfair advantage.

This policy recognizes that Members of Council are holders of their office until the end of the term and supports them in continuing to fulfill their responsibilities as Members of Council. Nothing in this policy shall preclude a Member of Council from performing their duty as an elected official, nor inhibit them from representing the interests of their constituents.

PURPOSE & BACKGROUND

The Act requires municipalities to establish rules and procedures for the use of municipal resources during the election period (section 88.18). The Act also provides that the City cannot make a contribution (including money, goods and services) to any candidate, registered third party advertiser or political party during an election (sections 88.8(4) and 88.12(4)). The *Election Finances Act* and the *Canada Elections Act* impose similar contribution restrictions for provincial and federal election campaigns, respectively.

The provisions in this Policy may also be subject to additional City by-laws and policies.

APPLICATION

This policy applies to municipal (including school board), provincial or federal elections or by-elections and to questions on the ballot. References in the policy with respect to political parties refers to provincial and federal elections or by-elections and do not apply to the City's municipal elections or by-elections.

This is Exhibit "B" referred to in the affidavit of MEGANN WILLSON sworn before me, this 21st day of AUGUST 2018. *[Signature]*
Tanya Elizabeth Athy, J.D., Commissioner, etc., Province of Ontario for Goldblatt Partners LLP, Barristers and Solicitors. Expires September 8, 2018.

PROVISIONS

1. Access to City Facilities during an Election Period

- 1.1 City facilities and City infrastructure may not be used for any election-related purpose by a candidate, registered third party advertiser or political party. In particular, signs may not be erected or displayed on or adjacent to a City park or facility that is owned or operated by the City, in accordance with Toronto Municipal Code, Chapter 693, Signs, Article II, Election Signs.
- 1.2 No permits, licenses, leases or any other agreement for the use of City facilities, including civic squares and parks, will be issued to promote, support or oppose a particular candidate, registered third party advertiser or political party.
- 1.3 All-candidate meetings may be held at City facilities for a nominal fee or other consideration provided that all candidates for an office are invited to attend such meetings.
- 1.4 Candidates, registered third party advertisers or political parties may not distribute campaign materials on or in City facilities or at City events, but are permitted to distribute campaign materials on public right of way sidewalks and thoroughfares, during all-candidates meetings, at public parks and at the following City managed public squares: Nathan Phillips Square, Mel Lastman Square, Albert Campbell Square and David Pecaut Square.
- 1.5 The City may issue a permit for the use of a City facility for election-related education purposes only, as long as no particular candidate, registered third party advertiser or political party is promoted, supported or opposed at the event. These events may include, but are not limited to: informing Members of Council or the public on how to become a candidate, registered third party advertiser or political party, or informing them on how to organize an election campaign.
- 1.6 Canvassing and distribution of campaign materials in some City facilities is permitted under the *Residential Tenancies Act, 2006* ("RTA"), which states that "No landlord shall restrict reasonable access to a residential complex by candidates for election to any office at the federal, provincial or municipal level, or their authorized representatives, if they are seeking access for the purpose of canvassing or distributing election material." City-operated Long-Term Care Homes and other City facilities governed under the provisions of the RTA fall under the definition of "residential complex".
- 1.7 Informal media scrums are permitted in the public or common areas at Toronto City Hall, Metro Hall, civic centres and at the following City managed public squares: Nathan Phillips Square, Mel Lastman Square, Albert Campbell Square and David Pecaut Square.

Informal media scrums may not include: apparatus, mechanisms or devices for the amplification of the human voice or any sounds. The activity may not disrupt regular City business. If the media scrum is disrupting City services, City staff may ask the participants to find an alternative location.

2. Access to City Resources during an Election Period

- 2.1 The City's logo, crest, slogans, etc., may not be printed, posted or distributed on any election-related campaign materials or included on any election-related website, in accordance with the City's Corporate Identity Program, except to link to the City's website to obtain information about the municipal election.
- 2.2 Candidates may not post photographs of themselves with City employees in uniform.
- 2.3 Photographic or video materials which have been or may be created by City employees or with City resources may not be used for any election purpose or in campaign materials.
- 2.4 Websites or domain names that are funded by the City may not include any campaign materials, make reference to and identify any individual as a candidate, registered third party advertiser or political party or profile any slogan or symbol associated with a candidate, registered third party advertiser or political party.
- 2.5 Domain names, websites or City email addresses that the City funds may not include any election-related campaign material and may not be re-designated for campaign purposes or provide a link to a campaign site.
- 2.6 Members of Council should follow the guidance of the Integrity Commissioner with respect to social media use.

3. Access to City Information during an Election Period

- 3.1 Information provided to one candidate, registered third party advertiser or political party that is of a general nature and may provide valuable guidance to all others will be provided to all candidates, registered third party advertisers or political parties. The City will post the information on the internet or through other mechanisms to ensure equal access to information.
- 3.2 Requests by a candidate, registered third party advertiser or political party for personal meetings with Division Heads or other City employees, as well as requests for tours of City facilities may not always be accommodated due to resource and time constraints. If a meeting or a tour is organized, the division

must commit to organizing a similar meeting or tour for all other candidates, registered third party advertisers or political parties.

- 3.3 City databases, with the exception of those specifically made for the use of candidates and registered third party advertisers, may not be used by any candidate, registered third party advertiser or political party, unless the database has already been released for public use.

4. Attending City Events during an Election Period

- 4.1 Candidates, registered third party advertisers or political parties are permitted to attend City events, or events held at City facilities, in either their capacity as elected representatives or as private citizens, but may not campaign while in attendance. No election signs may be posted and no campaign materials may be disseminated at City events.
- 4.2 Elected officials are permitted to attend City-organized events or events held on City facilities and act as ceremonial participants in their capacity as elected officials, including speaking at the event and partaking in ceremonial activities. In provincial or federal elections, once the writ is issued, MPPs and MPs, with the exception of the Ministers of the Crown, are no longer elected officials and therefore should not be invited to attend City events.

5. Restrictions to Services Provided to Members of Council beginning August 1 of an Election Year*

- 5.1 Members of Council may also be candidates in a municipal election. Accordingly, after August 1 in the municipal election year, the City will discontinue the following activities for Members of Council, irrespective of whether they are seeking election in the new term or not:
- 5.1.1 All forms of advertising and communication, including in municipal publications and social media accounts, that are paid for by City funds or operated and distributed by the City will not reference the name or image of a Member of Council.*
- 5.1.2 Signage for City events, including banners and posters, will not reference the name of a Member of Council.
- 5.1.3 The City's media releases or materials will not reference the name of a Member of Council. Where the City would typically name a specific Member of Council or the Mayor in its communications or media materials during an election period, it will make reference to the generic term "Councillor Ward XX" or "Mayor of Toronto" without naming the specific Member of Council. With the exception of inter-governmental initiatives

(per clause 5.3 below), this practice will be used for all City programs, events, announcements and to ensure effective communications with residents and businesses with respect to operational requirements, impacts or emergency situations.

- 5.1.4 Ceremonial documents such as retirement scrolls for employees, scrolls in celebration of anniversaries, Letters of Greeting and other celebratory documents normally signed and distributed by Members of Council will be signed by the Mayor as the Chief Executive Officer of the City. The City Clerk will mail documents directly to the recipient(s).
- 5.2 Members of Council are responsible for ensuring that the content of any communication material, including printed materials such as newsletters, advertising, etc., that the City funds for the operation of each Member's Office is not directly election-related.
- 5.3 After August 1 in the municipal election year, the Mayor will be subject to the same restrictions as Members of Council, but will continue to be named in media releases and City materials related to inter-governmental activities only in his or her capacity as Chief Executive Officer of the City.*

* Amended by item MM44.128 adopted by City Council at its meeting on July 23, 2018, to permit communications by Members of Council until September 7, 2018.

RELATED BY-LAWS, POLICES AND PROCEDURES

- City of Toronto Community Grants Policy:
<https://www1.toronto.ca/City%20Of%20Toronto/Shared%20content/Articles/Community%20Grants%20Policy%20All.pdf>
- City of Toronto Corporate Identity Program:
<http://insideto.toronto.ca/cip/introduction.htm>
- Code of Conduct for Members of Council:
<http://www1.toronto.ca/wps/portal/contentonly?vgnextoid=c0f738379bac0410VgnVCM10000071d60f89RCRD>
- Constituency Services and Office Budget Policy:
<https://www.toronto.ca/wp-content/uploads/2017/08/964b-constituency-services-office-budget-policy.pdf>
- Toronto Municipal Code, Chapter 192, Public Service:
<http://www.toronto.ca/legdocs/municode/toronto-code-192.pdf>
- Toronto Municipal Code, Chapter 693, Signs, Article II, Election Signs:

https://www.toronto.ca/legdocs/municode/1184_693.pdf

- Use of Social Media by Members of Council, Interpretation Bulletin from the Office of the Integrity Commissioner:
https://www.toronto.ca/wp-content/uploads/2017/08/94e1-IC_SocialMediaCouncilMembers.pdf

APPENDIX "A"

Definitions for terms in the City of Toronto Use of City Resources during an Election Period Policy

Certain terms and phrases used throughout the Policy are defined in the Municipal Elections Act, 1996 (Act), the City of Toronto Act, 2006, and other relevant legislation. For those terms and phrases not so defined, the following definitions shall be used.

"Campaign Materials" – means any materials used to solicit votes for a candidate or question on the ballot in an election period including, but not limited to: literature, banners, posters, pictures, buttons, clothing, or other paraphernalia. Campaign materials include, but are not limited to: materials in all media, such as print, displays, electronic, radio or television and online sources including websites or social media.

"Campaigning" – means any activity by or on behalf of a candidate, registered third party advertiser, political party or question on a ballot meant to elicit support during the election period. Campaigning does not include the appearance of elected officials, other candidates or registered third party advertisers at an event in their personal capacity without the display of any signage or graphic which identifies the individual as a candidate or registered third party advertiser(s) and without the solicitation of votes.

"Candidate" – means any person who has filed and not withdrawn a nomination for an elected office at the municipal (including school board), provincial or federal level in an election or by-election.

"City Resources" – means, but is not limited to: City employees, City events, City facilities, City funds, City information and City infrastructure. These are further defined as follows:

- "City employees" – means all non-union management and exempt employees, and all members of City bargaining units.
- "City events" – means events funded or organized by the City or Members of Council, including events that may be jointly organized with community organizations or with external sponsors. City events include, but are not limited to: community meetings and consultations; parks, recreation or cultural facility openings or celebrations; and Community Environment Days. Events organized by City agencies and corporations are not considered City events for the purpose of this policy.
- "City facilities" – means any facility which is owned or leased by a City division and which is directly managed and operated by City divisions or programs, including, but not limited to:

- Toronto City Hall, Metro Hall, civic centres
- City-managed civic squares including: Nathan Phillips Square, Mel Lastman Square, Albert Campbell Square and David Pecaut Square. Excludes Yonge Dundas Square
- Community centres, arenas and club houses operated by Parks, Forestry and Recreation
- Museums and cultural facilities operated by Economic Development and Culture
- Buildings and yards operated by Toronto Water, Solid Waste Management and Transportation Services
- Child care centres
- Toronto Employment and Social Services offices and employment centres
- City shelters
- Constituency offices leased by Members of Council and paid for by City funds

Long-Term Care Homes are considered tenanted buildings under the Residential Tenancies Act, 2006 and have different legislative requirements and are mandated to allow canvassing and distribution of campaign materials to home residents either floor to floor or in meeting rooms.

City facilities do not include public right-of-ways such as sidewalks, roads and boulevards and laneways.

- "City funds" – means funding support through the City's annual operating or capital budgets, including, but not limited to: funds provided directly to City programs and services, Member of Councils' expenses and staffing budgets. The City's Community Grants Policy outlines political activity provisions for a grant recipient. It states that grant recipients shall not use funds provided by the City to oppose or endorse a named party or elected official. Any such grants may not be devoted directly to such activities or devoted indirectly through provision of resources to a third party engaged in partisan political activities.
- "City information" – means any information in the custody and control of the City, including databases that may be the repository of names, contact information, business records, financial information or other identifiers compiled and used by City employees to conduct City business. Examples of City databases include: grants recipients, lists of event attendees and resident association lists.

Constituent information collected by Members of Council is not under custody or control of the City and are not considered City information for the purpose of this policy.

- "City infrastructure" – means any physical or technology systems that support the operation of City programs and services, including but not limited to: City's ferries and fleet vehicles, computer network, telecommunications and email system, wireless equipment, computer hardware, software and peripherals, internet and intranet. Excludes public right-of-way including sidewalks, roads, laneways and boulevards.

"Contribution" – as defined in the Act:

- For a candidate – means "money, goods and services given to and accepted by a person for his or her election campaign, or given to and accepted by another person who is acting under the person's direction".
- For a registered third party advertiser – means "money, goods and services given to and accepted by an individual, corporation or trade union in relation to third party advertisements, or given to and accepted by another person who is acting under the direction of the individual, corporation or trade union".

"Elected Official" – means an individual elected to the House of Commons, the Legislative Assembly of Ontario, Toronto City Council or a school board.

"Election" – means an election or by-election at the municipal (including school board), provincial and federal level of government, or the submission of a question or by-law to the electors.

"Election Period" – means the official campaign period of an election.

- For a municipal (including school board) election, the election period commences on May 1 of an election year and ends on voting day.
- For a provincial or federal election, the election period commences the day the writ for the election is issued and ends on voting day.
- For a question on the ballot, the period commences the day City Council passes a by-law to put a question to the electorate and ends on voting day.
- For a by-election, the period commences when the by-election is called and ends on voting day.

"Media Event" – means an event such as a press conference or photo opportunity to which the media is invited and the purpose of which is to promote, support or oppose a candidate, registered third party advertiser, a political party or a position on a question on a ballot. Features of a Media Event can include, but are not limited to: the issuing of a media advisory stating date, time and location of briefing/press conference, use of

backdrops, podiums or public address systems, the distribution of media releases, media kits, display of signage or other materials to promote, support or oppose a candidate, registered third party advertiser or a position on a question on a ballot.

"Media Scrum" – means an unplanned encounter between a candidate, a registered third party advertiser, their staff or with media.

"Member of Council" – means the Mayor and Members of Council, except where the Mayor acts as the Chief Executive Officer of the City.

"Political Party" – means political parties for provincial and federal elections that are registered under the Ontario *Election Finances Act* or in the registry of parties referred to in section 374 of the *Canada Elections Act*. Under the current legislative framework, political parties cannot participate in the City's municipal elections or by-elections.

"Question on a Ballot" – means any question or by-law submitted to the electors by Council, a school board, an elected local board, or the Minister of Municipal Affairs under the Act.

"Registered Third Party Advertiser" – means, in relation to a municipal election, an individual, corporation or trade union that is registered with the City Clerk, as per section 88.6 of the Act, whose purpose is to promote, support or oppose a candidate for office, or an issue on a question on a ballot, and is not under the direction of a candidate.

"Third Party Advertisement" – means an advertisement in any broadcast, print, electronic or other medium that has the purpose of promoting, supporting or opposing a candidate for office, or an issue on a question on a ballot, and is not under the direction of a candidate.

"Voting Day" – means the day the final vote is to be taken in an election.

TAB 12

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**CHRIS MOISE and ISH ADERONMU and PRABHA KHOSLA on her own behalf and
on behalf of all members of Women Win TO**

Applicants

- and -

**ATTORNEY GENERAL OF ONTARIO and
THE CORPORATION OF THE CITY OF TORONTO**

Respondents

APPLICATION under Rule 14.05(3)(g.1) of the *Rules of Civil Procedure*, RRO 1990, Reg 194

**AFFIDAVIT OF CHIARA PADOVANI
(Sworn August 21, 2018)**

I, Chiara Padovani, of the City of Toronto, MAKE OATH AND SAY:

1. I am a resident of the City of Toronto. I am also a candidate in the 2018 Municipal Election and a participant in Women Win TO. For these reasons, I have direct knowledge of the matters to which I depose in this affidavit. Where the information in this affidavit is not based on my direct knowledge, but is based upon information and belief from other sources, I have stated the source of that information and I believe the information to be true.

Background

2. I currently live in Toronto in Ward 11 (under the 47-ward and 44-ward structure). Ward 11 is in the north west of the City, and is currently bounded by Scarlett Road on the west, Jane Street and just east of Weston Road on the east, Highway 401 on the north, and the

CPR rail line on the south. I regularly voted in past municipal elections, and it is also my intention to vote in the 2018 municipal election. Attached to this affidavit and marked as **Exhibit “A”** is a copy of my current CV.

My Decision to Run as a City Councillor

Growing up in Ward 11

3. I grew up in the neighbourhood of Weston-Mount Dennis in what is currently Ward 11. For as long as I have lived in the ward, Frances Nunziata has been an elected representative in the area. I running against her for City Council in the 2018 municipal election.

4. I am intimately familiar with the issues and communities in the area where I am running for Councillor. My decision to run for City Council was based on my experiences growing up as part of a community that has historically been denied the services we need from municipal government, as well as my experiences doing international human rights work. I am running for City Council because I believe my community deserves better representation, and better services from the City.

5. My experiences in high school gave rise to a keen awareness that I was living in a starkly unequal city. Even as a youth I was aware that I was living in a community that was neglected by local government, and that one’s ability to access opportunities in this City largely depended on your postal code and your socioeconomic status.

6. I was in my final year of high school during what came to be known as the ‘Summer of the Gun.’ One of my former classmates tragically lost his life to gun violence. At the same

time, I was also aware that for over a decade, our community had been promised a recreation centre by the City which had yet to materialize. While I was able to attend recreational activities because my parents had well-paying union jobs and could afford to send me to recreational programming, I was aware that many youth in my community did not have the same opportunities.

My Experiences with Local Governance as an International Human Rights Worker

7. I decided to pursue a career in social work and community development based on my observations that municipal government was neglecting my community, as well as the inequality in the City that led to members of my community losing their lives, and being denied opportunities. I eventually pursued international human rights work, and was working in Argentina when, towards the end of 2016, I decided to return to the neighbourhood I grew up in to run for City Council.

8. My experiences doing international human rights work also led me to acknowledge the importance of local government and municipal governance structures to guaranteeing human rights, reducing poverty and inequality, and implementing the United Nations' Millennium Development Goals and Sustainable Development Goals. I came to recognize that local governance structures are crucially important to redressing growing urban inequalities and that municipal government, along with other levels of government, is required to provide and implement access to social and economic goods like affordable housing.

9. In my international human rights work, I also became aware that local governments often did not act in response to growing inequality. My experiences taught me about the need

for local representatives who are willing to step up for their communities and demand adequate services from municipal government based on their community's needs.

Moving Back To Toronto and the Impact on My Family

10. I decided to move back to Toronto from Argentina, after working there for three years, to run for City Council. My decision was based on the fact that I felt that my community needed better representation on City Council than the current incumbent has offered. Before I made the decision, I looked into whether there would be any diverse, community-centred voices challenging the incumbent in Ward 11. As I became aware that diverse and progressive candidates were not stepping up to run against the incumbent, I decided that I would take on the challenge and moved back to Toronto in late 2016.

11. My husband is Argentinian, and moving back to Toronto meant that he would have to quit his job, leave his extended family, and commence the immigration process to become a Canadian citizen. Although it has been more than a year, my husband's immigration process is still ongoing.

My Participation in WWTO

12. Women Win TO is a program training and preparing women, trans, and gender non-conforming individuals of diverse backgrounds, all of whom are currently underrepresented in local governance, to run for office. I made the decision to run for City Council before WWTO started, but as soon as I found out about them, I went to information sessions, applied to their program, and signed up when I was accepted.

13. As a candidate, the WWTO program has been invaluable. I believe that their work has been extremely beneficial to all the candidates involved. I am aware that WWTO works with an extremely limited budget funded by donations, and that the organizers are all women volunteers seeking improved representation for local government. To my knowledge, the limited funds available to WWTO were spent on booking rooms for training sessions, and on honorariums for guest speakers.

The Impact of Changing the Boundaries During the Election Campaign on My Campaign

My Campaign Has Been Focused on Gaining an Intimate Knowledge of the Local Issues Affecting Ward 11

14. As a result of Bill 5, Ward 11 and Ward 12 are being combined into a new Ward 5, York South-Weston, reflecting the provincial and federal electoral ridings of York South-Weston. When I registered as a candidate for City Council, it was for Ward 11, where I grew up and have roots. Although I am familiar with Ward 12, and have connections to both Ward 11 and 12, to date in the campaign I have been conducting issue-based campaigning only in Ward 11, and have come to know the local issues affecting that ward intimately. Even before my registration as a candidate for the 2018 election, I engaged in substantial efforts to engage community members around important local issues in Ward 11 for over a one and a half year period such as flooding, road safety, and tenant rights. As a result, I now know where residents feel there should be additional speedbumps, crosswalks, and reduction in speed limits. I do not have this type of knowledge for any other ward, including Ward 12.

15. Despite going to school in Ward 12, and having family that lives there, I do not have the same knowledge of the deeply local and particular issues affecting residents in Ward 12. I have focussed all my attention, both before and after the commencement of the official campaign period, on community engagement in Ward 11, and have been talking to residents in this ward only, on a daily basis, getting to know the challenges they face.

16. The impact of Bill 5 combining the two wards is especially severe on my campaign because I have almost completed canvassing all of Ward 11. With the time remaining in the run up to election day, my intention was to re-canvass areas in Ward 11 where I had strong support from residents, to remind them of my candidacy and ensure they turned out for the election.

17. While I have knowledge of the bigger picture issues affecting Ward 12, it will be impossible for me to replicate the specific local knowledge I have of Ward 11 in the limited amount of time remaining until the election. If I had notice of the change in ward boundaries prior to the commencement of the campaign, I would have been able to plan my ground strategy, and I would have attempted to gain a deeper knowledge of the local issues affecting residents in Ward 12 by actively canvassing in that ward. At this point, it will be impossible for me to carry out double the amount of canvassing that I have completed with the limited time remaining.

18. I have decided to continue my efforts to become a City Councillor, and to re-register as a candidate in the new Ward 5 (York South-Weston). However, I remain concerned that my candidacy for City Council has been compromised and adversely affected by Bill 5, as explained in further detail below.

19. The ward I am running in is notorious for having one of the least representative voters' lists in the city. I am aware that voters' lists are developed by the Municipal Property Assessment Corporation ("MPAC") based largely on property ownership. The MPAC lists therefore tend to exclude renters and low-income people, as well as immigrants. This year, a Toronto Star investigative report focusing on the representativeness of juries in Ontario detailed the fact that the MPAC database for Ward 11 excludes close to 95% of the adults who are of voting age in Ward 11. According to the Toronto Star, there are an estimated 41,545 jurors in Ward 11 and only 2,209 of them appear in the MPAC database. In contrast, in Ward 32, which includes the wealthier Beaches area of Toronto, only 13% of eligible jurors were excluded from the MPAC database. Attached to this affidavit and marked as **Exhibit "B"** is a copy of the Toronto Star article titled, 'How a broken jury list makes Ontario justice whiter, richer and less like your community.'

20. It is my understanding that information from MPAC is the primary source for developing the municipal voters' list in the ward. If a resident is not in the MPAC database, and has not voted in the past, then they will likely not receive a voting card in the mail. My experience canvassing in Ward 11 has led to a lot of voter education and I have assisted several residents to sign up to vote for the first time, even though they have been citizens for many years. The way that MPAC develops its voter list is a significant barrier to residents in my community having their voices heard in the electoral process, and demonstrates the heightened importance of canvassing and voter engagement in this ward. Based on what I know about the demographics of Ward 12, I am also concerned that the voters' list in that ward similarly fails to reflect the actual population. As a result, in a combined ward with

double the population, it is far less likely that candidates like myself will be able to canvass across the entire ward and properly engage marginalized groups in Ward 11 who have been systematically excluded from electoral processes, and from local government as a result. I am therefore concerned that combining the two wards will create barriers to voters' participation in the upcoming municipal election, and lead to a low voter turnout based on the current lack of representativeness of the MPAC database.

Impact of Running Against Two Incumbents, and a Candidate Sharing a Similar Support Base

21. As a result of the combining Ward 11 and Ward 12 into the single new Ward 5 (York South-Weston), I will now be running against two incumbents, Frances Nunziata (the current Councillor of Ward 11), and Frank Di Giorgio (the current Councillor of Ward 12). Although my campaign platform is distinct from the platforms of both incumbents, I am concerned that I will not be able to compete in an election against two incumbents who already enjoy decades of name recognition in municipal politics, and who will undoubtedly outspend me. My campaign has limited resources, including because I am a first-time candidate without much widespread name recognition, and because my supporters are largely made up of lower income individuals. My concerns about running against two incumbents also stem from the increased spending limits as a result of combining the two wards. The maximum spending amount allowed in the election for Ward 11 was around \$35,000, but that maximum is likely to become closer to \$62,000 as a result of combining the wards. I was confident I could raise sufficient funds for a competitive campaign in Ward 11 based on the spending limits in place at the commencement of the campaign period, but it is not likely I will raise anything close to \$62,000, which I believe would be necessary to campaign effectively against two well-

resourced incumbents, particularly given the limited amount of time remaining in the election period.

22. In part, I believe that the incumbents I am running against will be able to raise \$62,000 because they will receive donations from wealthy and well-connected individuals, including individuals who have ties to development companies. I made a political decision not to accept donations from individuals with ties to large corporations or development companies, because I want my campaign to be responsive to the needs of the ward's residents, and not be beholden to special interests. Any difference in the nature of our support-base would have been minimal under the previous ward structure because I still expected to raise the maximum amount of \$35,000. However, because I cannot now raise double the amount of money that I have already raised, I will only be able to afford at best half the signs, and half the campaign literature that the incumbents will be able to afford, further disadvantaging me in relation to their campaigns, when I had been poised to compete effectively against an incumbent in a one ward campaign. Combining Wards 11 and 12 also means that the campaign materials I developed specifically for Ward 11 are now wasted resources and that I will need to spend campaign resources on printing additional campaign literature.

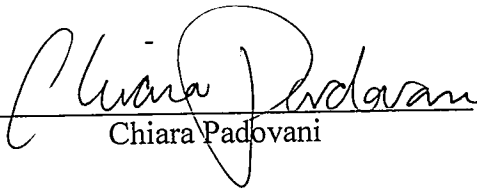
23. Combining Wards 11 and 12 also means that I am now running against Lekan Olawoye, a candidate in Ward 12. Lekan and I appeal to some of the same constituents, and we were both endorsed by the Toronto-York Region Labour Council. If the election proceeds based on the combined wards, Lekan and I would be competing for endorsements from the same kinds of organizations, and it would negatively impact my campaign not to have the endorsement of organizations that have been supporting me up until this point.

24. I swear this affidavit in support of the Applicants' application and for no other or improper purpose.

SWORN AFFIRMED BEFORE ME at the City of Toronto, Ontario this 21st day of August, 2018.



A Commissioner for taking Affidavits (*or as may be*)

} 

Chiara Padovani

EXHIBIT A

Chiara Padovani 329

Highlights

Extensive experience in project management:

Seven years of experience in project development, implementation and evaluation in Canada and Latin America.

Extensive experience in resource development & donations:

Five years of experience in grant-writing and resource mobilization.

Extensive work experience with women, children & youth:

Over ten years experience working with diverse women and children and extensive frontline training.

Experienced in outreach & facilitation:

Five years of facilitating workshops aimed at preventing gender-based violence and promoting gender and social justice.

Substantial social media & communication skills:

Experienced public speaker and extensive knowledge of graphic design and video editing software.

Languages

English Native Spanish Fluent

Education

Masters in Social Work

2012-2014

York University (Toronto, Canada)

B.A. in International Development

2006-2010

Trent University (Peterborough, Canada)

Employment History

Agency Relations Coordinator 2017-2018

North York Harvest Food Bank (Toronto, Canada)

- Assisting member agencies in the implementation of best practices in food security program delivery
- Engaging community partnerships in the delivery of wrap-around and referral services
- Coordinating capacity-building opportunities for members of North York Harvest's agency network

Project Consultant 2017

Freelance

- Worked with international NGOs to develop diverse human rights and women's rights projects
- Assisted organizations with funding applications and project reporting
- Provided gender analysis and recommendations in project planning
- Developed, designed and edited outreach materials from a gender perspective

Institutional Development Officer 2014-2016

Center for Legal and Social Studies - CELS (Buenos Aires, Argentina)

- Developed, monitored and reported on human rights projects aimed at protecting and promoting migrant, indigenous, economic, sexual and reproductive rights and preventing institutional violence in police, penitentiary and mental health institutions
- Coordinated the national and international volunteer program
- Developed and managed individual donor program
- Administered and monitored the customer relationship management program, Salesforce

Project Coordinator 2010-2012

GAMMA Foundation (Cuenca, Ecuador)

- Coordinated women's empowerment projects with an emphasis on violence prevention, women's rights, sexual

and reproductive health and sexual diversity

- Drafted financial, narrative and technical project reports for international funding agencies and organizations
- Facilitated participatory and popular education workshops with diverse groups of women and youth
- Organized and coordinated national campaigns and events

Literacy Program Administrator 2008-2010
Frontier College
(Kashechewan and Ft. Albany First Nations)

- Planned and implemented non-formal literacy programs for Indigenous children and youth
- Collaborated with elders and community organizations on programming
- Completed program evaluations and financial reports

Camp Counsellor 2004 - 2007
City of Toronto Summer Camp (Toronto, Canada)

Internships

Outreach Worker 2014
The White Ribbon Campaign (Buenos Aires, Argentina)

- Developed extensive knowledge in gender-based violence prevention from a masculinities perspective
- Created, implemented and evaluated gender-based violence prevention workshop modules
- Networked with feminist organizations in Buenos Aires, Argentina

Community Worker 2012-2013
Weston-King Neighbourhood Centre (Toronto, Canada)

- Supported clients through harm-reduction services and drop-in programming
- Referred clients to appropriate social service agencies and organizations
- Built community partnerships for the implementation of satellite projects

Communications Officer 2009
GAMMA Foundation (Cuenca, Ecuador)

- Designed promotional material (posters, videos, radio spots, flyers, etc.) for women's rights and anti-violence campaigns (portfolio available on request).

Training & Qualifications

328

Advanced Trauma-Informed Care
2017, Toronto Hostels Training Centre

Harm Reduction Training
2017, Toronto Hostels Training Centre

Financial Resilience Training for NGOs
2016, Spring Strategies

Digital Security and Online Communications for NGOs
2015, Aspiration Tech

Google Analytics for NGOs
2015, Google Argentina

Gender and Masculinities Training
2014, The White Ribbon Campaign

Advanced Teaching English as a Foreign Language (TEFL) Certificate
2014, Ibero Institute

Non-Violent Crisis Intervention Training
2013, North York Harvest Food Bank

Food Handlers Certificate
2014, TrainCan, Inc.

Certificate of Recovery Model Competency
2013, School of Social Work, York University

Anti-Oppression Training
2010, OPIRG Peterborough

Applied Suicide Intervention Skills Training
2010, ASIST

Emergency First Aid and CPR
2010, Canadian Red Cross

Facilitator Training
2006, Leaders Today

Conflict Resolution and Child Abuse Awareness Training
2005, Youth Assisting Youth

Research Experience

Research Assistant 2013-2014
School of Social Work at York University (Toronto, Canada)
• Qualitative investigation about gender inequality in the nonprofit sector

Graduate Assistant 2012-2013
School of Social Work at York University (Toronto, Canada)
• Researched media representations of the Guatemalan military dictatorship of the 1980s
• Applied discursive analysis to the ways in which military and government officials justified the genocides that occurred in Guatemala in the early 1980s

Community-Based Researcher 2012-2013
New Opportunities for Innovative Student Engagement, (NOISE) of York University (Toronto, Canada)
• Facilitated youth-engaged community-based research in a priority neighbourhood of Toronto
• Supported high school participants in the development and implementation of their own community action project

Additional Experience

Team Coordinator 2017- present
Food Friendly Neighbourhood project “YSW @ the Table”
• Networked with food programs and initiatives to support and map food assets in West Toronto
• Developed communication materials for food security outreach and dissemination

Project Consultant 2014 - 2016
“Yo No Fui” (Buenos Aries, Argentina)
• Developed and monitored income-generating project proposals for previously incarcerated women in Argentina and obtained funding from international foundations

Project Consultant 2014 - 2016
Asociación Civil Lugar de Mujer (Buenos Aires, Argentina)
• Implemented needs assessment surveys and designed social projects aimed at preventing gender-based violence

Memberships & Affiliations 329

Registered Social Worker
Ontario College of Social Workers and Social Service Workers
2017 - present

International Committee Member
Ni Una Menos Collective (Buenos Aires, Argentina)
2017 - present

Board Member
Grupo de Apoyo al Movimiento de Mujeres de Azuay (Cuenca, Ecuador)
2015 - present

Awards & Honours

Entrance Scholarship
2012, Department of Graduate Studies at York University

Ontario Volunteer Service Award
2010, Ontario Ministry of Citizenship and Immigration

Dean’s Honour Roll
2006-2010, Trent University

Millennium Excellence Local Award
2006, Canada Millennium Scholarship Foundation

Special Admissions Scholarship
2006, Trent University

Lieutenant Governor’s Community Volunteer Award
2006, Ontario Ministry of Citizenship and Immigration

Valedictorian
2006, York Memorial Collegiate Institute

Founding Member and Finance Officer

2009 - 2010

Community Movements Conference (Peterborough, Canada)

- Wrote grant proposals and applied for funding from various sources
- Created and updated conference budgets and maintained financial records
- Prepared and submitted financial, technical and narrative reports to funders in a timely manner

- 330

Co-Coordinator

2007 - 2010

**Student Refugee Program, World University Services of Canada, Trent University
(Peterborough, Canada)**

- Served as a liaison between the University administration and the sponsored student
- Supported the student in their transition to Canada and Trent University and advocated on their behalf when necessary
- Spearheaded successful campaigns to increase the student levy in order to sponsor additional students

EXHIBIT B



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► News • Investigations

How a broken jury list makes Ontario justice whiter, richer and less like your community

By EBYAN ABDIGIR, KVESCHE BIJONS-EBACHER AND PALAK MANGAT Ryerson School of Journalism

ROBERT CRIBB Investigative Reporter

JIM RANKIN Feature Writer

Fri., Feb. 16, 2018



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r/Ryerson School of Journalism investigation documenting the racial makeup of als since 2016 in Toronto and Brampton reveals flaws in the jury selection rds property owners, fails to reflect the GTA's growing diversity and excludes Ontarians from serving their civic duty.

based on the province's property assessment rolls, excluding many renters, ors, spouses who are not named on property titles, transient and low-income ple and those unable to afford property in a red-hot real estate market.

This is Exhibit "B" referred to in the affidavit of CHIARA PADOVANI sworn before me, this 21 day of AUGUST 2018. A COMMISSIONER, ETC.

Beginning in February 2016, reporters from the Star and Ryerson University's School of Journalism attended 52 trials in the Greater Toronto Area to document juries' racial composition. The investigation revealed flaws in a jury selection process that skews towards property owners, fails to reflect the GTA's growing diversity and excludes potentially millions of Ontarians from serving their civic duty.

What remains is a prospective juror list disproportionately comprised of white Ontarians able to afford the significant costs of serving in a system that often pays jurors less than minimum wage and does not cover expenses such as travel, parking, meals and child care. It is a particular hardship for hourly workers — Ontario has no law compelling companies to compensate employees for jury duty — the self-employed or those in temporary or contract jobs.

READ MORE:

Got jury duty? Ontario asks you to serve for below minimum wage — and won't pay your expenses

Can you afford jury duty? Here's how each province compensates you for your service

Seventy-one per cent of the 632 documented jurors were white in cities where more than half the population identifies as non-white (In Toronto, 51.4 per cent of residents identify as visible minorities; in Brampton, the figure is 73.3 per cent).

People who identify as Indigenous are not counted as visible minorities by Statistics Canada.

The finding of innocence or guilt by a jury of our peers is a pillar of Canada's justice system that has been shaken by the recent verdict — delivered by an all-white jury — acquitting white Saskatchewan farmer Gerald Stanley in the second-degree murder of a slain Cree man named Colten Boushie.

Following Stanley's acquittal, Prime Minister Justin Trudeau said, "as a country we can and must do better," and justice minister Jody Wilson-Raybould said the government is looking at peremptory challenges, which are used by the defence and prosecution to reject potential jurors without stating a reason. Reports say Stanley's defence rejected five potential jurors who appeared to be Indigenous.



Toronto lawyer Steven Hinkson recalls a Black client asking him, "How come there aren't any Black people on the jury?" Hinkson told the 36-year-old man he was defending, "that's all we had to choose from." (RICK MADONIK / TORONTO STAR)

The Star/Ryerson investigation reporters did not watch jury selection in all 52 trials. The data in this story is based on sitting juries after the selection process, including peremptory challenges.

Beginning in February 2016, reporters attended GTA trials to document juries' racial composition.

Because the Ministry of the Attorney General does not keep this data, and observers are denied contact with individual jurors, reporters decided upon a visual survey as the most complete possible method to gauge the racial makeup of juries.

Reporters noted jurors' race based on their physical appearance, using the same categories as police: white, Black, Indigenous and brown, which includes South Asian people. Reporters added the categories Asian and other, which included Latin American, Middle Eastern or mixed-race jurors.

Of the juries documented, only three were composed of 50 per cent visible minority and 50 per cent white jurors. In most cases, white jurors represented the majority with as many as 11 of the 12 positions.

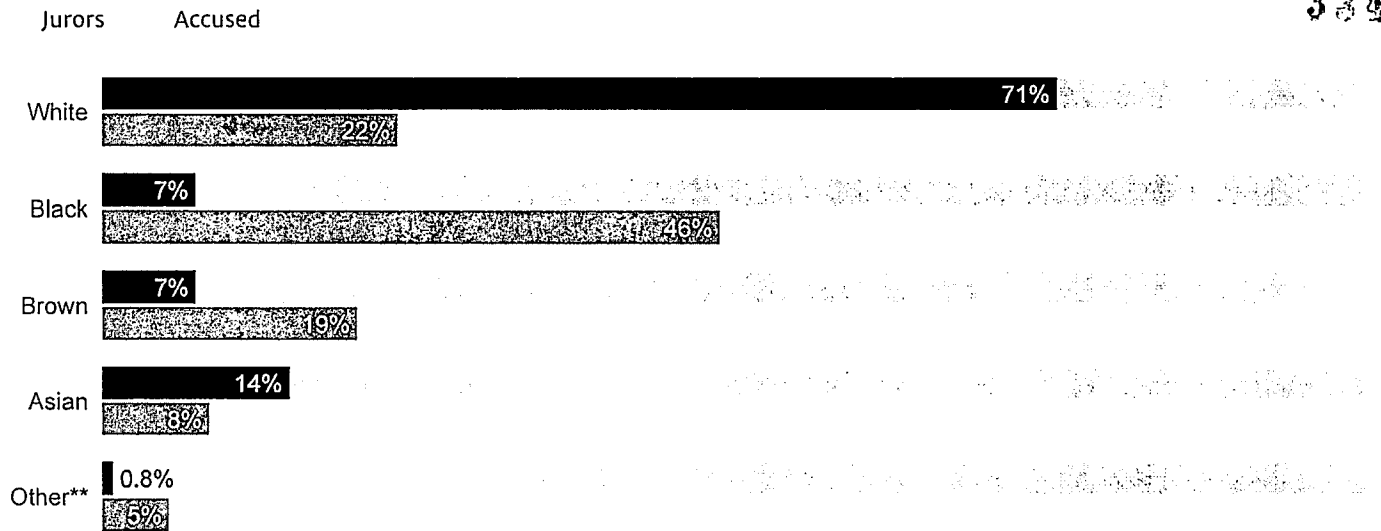
Of the 632 jurors surveyed by reporters, 451 (71 per cent) were white; 45 (7 per cent) were Black; 42 (7 per cent) were brown; 89 (14 per cent) were Asian; and 5 (less than 1 per cent) were listed as other. Reporters were unable to identify a single Indigenous juror.

Across the aisle, the visible ethnicity of the accused presented a very different picture: Of the 59 documented accused (some trials had more than one), 27 (46 per cent) were Black; 13 (22 per cent) were white; 11 (19 per cent) were brown; five (8 per cent) were Asian and three were counted as other.

Racial makeup of jurors and defendants in Brampton and Toronto

Based on 632 jurors and 59* accused at 52 trials since 2016.

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*Some trials had more than one accused

**Other includes Latin American, Middle Eastern or mixed-race

Toronto Star Graphic

Over the past decade, as the province's cities grew increasingly diverse, the Ministry of the Attorney General has fielded many complaints and concerns about the Ontario jury system.

In 2013, Former Supreme Court judge Frank Iacobucci, who authored a report on the lack of Indigenous representation on jury rolls on First Nations reserves, recommended that the Ministry of the Attorney General "undertake a prompt and urgent review" of "using the OHIP database."

That database, which better reflects Ontario's population, is still not being used.

"There's obviously a problem here," says Ottawa defence lawyer Michael J. Spratt. "Trial by jury is a cold comfort when you're told that you will be tried by a jury of your peers and no one on that jury looks like a peer. We're unable to drag our courts into the 21st century and perhaps that explains why our jury system is still stuck in the 19th century."

The first step in jury selection begins with a notice to Canadian citizens 18 years old and over from a database that generates property ownership and enumeration lists. It is managed by the Municipal Property Assessment Corporation (MPAC) and contains 9.5 million names of both property owners and non-owners.

The database is incomplete. But it has been used as the source for the jury pool for decades.

In a written statement, the Ministry of the Attorney General acknowledged the database used for jury selection, "does not capture everyone in the province" and that it is "committed to improving the provincial jury process."

MPAC officials also concede shortcomings in the database including large groups of Ontarians who don't own property.

Creating lists of prospective jurors is "not our core business," said Syd Howes, manager of information services at MPAC. "This is a property assessment database, this is not a people database."

Among the blind spots: "We don't have very many resident students in our database," says Howes. "And you have fairly large populations in nursing homes and retirement homes and again, we wouldn't have a lot of those names in our system."

MPAC doesn't attempt to assess properties on First Nations reserves, since they are not subject to taxation. The Ministry of the Attorney General says those living on First Nations are entered into the pool from "other lists, like Band lists."

It is unclear how those who don't own property, such as renters, are captured. MPAC has mailed occupancy questionnaires to residential properties asking for information for non-owners but only about 20 per cent of the forms are returned, says Howes.

"We have no means of identifying when people move. People aren't required to tell us ... We don't have access to good tenant information."

The existing data on non-owners can be plagued with errors. After the 2014 election, MPAC reported 1.2 million revisions to the voter's list, including changes to 20 per cent of its tenant list, according to a 2015 review obtained by the Star.

The faces that do make it into jury boxes across Toronto and Brampton often have one thing in common: they're white.



Harpreet Saini, a criminal lawyer in the GTA, says having a jury of peers does not mean a jury must be "exactly like you," but reflects "the diverse interest of your community." (ANDREW FRANCIS WALLACE)

In February 2016, reporters recorded a jury of 11 white people and one brown man hearing the case of a 25-year-old Black male. In March 2016, 10 white jurors, one brown and one Asian heard the case of a 40-year-old brown female. In January 2018, 10 white people and two Asians heard evidence in the trial of a 30-year-old Black male.

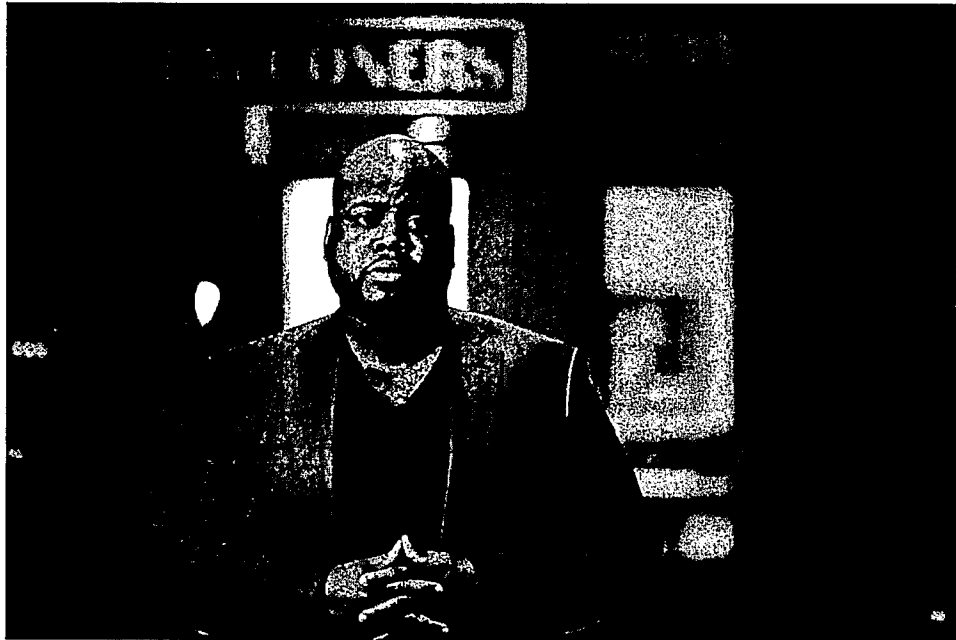
Harpreet Saini, a criminal lawyer who has been practising in the GTA for more than a decade, is not surprised.

“There is still a disparity between the communities that we serve and the different types of people who are represented in the criminal justice system.”

For Saini, a jury of peers is one that reflects “the place where you live.” That does not mean a jury must be “exactly like you,” but reflects “the diverse interest of your community.”

Anthony Morgan, a Toronto lawyer with Falconers LLP, says it’s time for the government to name the problem and take action.

“We’re never going to get to a place where we can fix this until we outwardly say, yes, there is an underrepresentation of Black people on juries but there is a dramatic overrepresentation of Black folks who stand charged of crimes,” he says.



Anthony Morgan, a Toronto lawyer with Falconers LLP, says it's time for the government to acknowledge the underrepresentation of Black jurors and overrepresentation of Black accused. (VINCE TALOTTA)

In a Toronto jury selection pool of 119 people on Wednesday, reporters counted only three Black prospective jurors. The accused is a Black man in his 20s.

In 2016, Toronto lawyer Steven Hinkson represented a 36-year-old Black man charged with drug and weapons offences. Eleven of the 12 jurors were white.

His client had a question: How come there aren't any Black people on the jury?

"I tried to explain to him, that's all we had to choose from," says Hinkson. "Justice has to appear to be fair and equal. If persons who are in the system don't see themselves reflected in the system they aren't going to have much faith in the system."

Hinkson, who rarely sees more than one or two non-whites on a jury, says that jurors, who are not "culturally sensitive to a racialized person's experience," are likely to look upon defence witnesses with "undue scrutiny."

Jurors unfamiliar with a dialect or accent, for example, "may not look upon the testimony as being equal to somebody who doesn't have an accent or have a negative perception of them as a consequence."

The trial of Hinkson's Black client ended in a hung jury.

Hinkson suspects the majority of the jury was aligned against his client with the exception of the lone non-white member who he says was of East or West Indian descent.

"I think the person of colour was the one that saved us. I think that's because he could relate more to what the defence was saying. The jury was coming back saying there was one member of the jury that was problematic. And you can see dynamics, the body language. It's clear to my observation that he was the problem in this jury because his views were not what they wanted."

In the second trial, his client entered into a deal to reduce the charges in exchange for a guilty plea on lesser charges.



Vanessa MacDonnell, a University of Ottawa law professor, says switching to the OHIP database to summon potential jurors could be done "without too much difficulty because these are lists (the government) compiled anyway." (PATRICK DOYLE)

Vanessa MacDonnell, a University of Ottawa law professor, says lawyers have a "professional responsibility, and I would say a constitutional obligation, to ensure that they don't discriminate against people as part of jury selection process."

She supports a switch to the more comprehensive OHIP database which could be done “without too much difficulty because these are lists (the government) compiled anyway.”

Former Ontario chief justice Patrick Lesage, retired after serving for nearly three decades on the bench, agrees property ownership is an inappropriate starting point for jury selection.

“If that is the case, it should not be the case,” he said. “It should be (representative of) a cross section of the community at large.”

Provincial health cards, he says, “may be the most universal list that exists. I can’t think of anything that each of us is more certain to have than a health card.”



Ottawa defence lawyer Michael J. Spratt says Canada's "jury system is still stuck in the 19th century." (PATRICK DOYLE)

Ottawa defence lawyer Michael Spratt sees the same jury faces all the time — white, middle class and older.

“I don’t care who makes (the juror list) as long as it is complete and as long as it is a full and accurate representation of the community, and that all individuals — whether you are poor, rich, white, Black, homeless or a homeowner — have an equal probability of forming that list,” he says.

Toronto lawyer Brian Eberdt, who is with Lockyer Campbell Posner, predicts 90 per cent of those involved with the criminal justice system would agree jury selection is a problem.

“I think it’s something that all members of the justice system — from defence, Crown, the court, the judges, and the ministry — I think it’s incumbent on all of us to make sure that the impact of race in distorting a jury’s deliberations is kept to a minimum ... We’ve got a long way to go.”

Eberdt points to a jury selection in Brampton last year for a trial involving allegations against his Black client.

“In the entire room of several hundred jurors, I think I saw maybe half a dozen Black people. I know for sure that’s not entirely representative of the cultural mix of Brampton. There’s an unfairness to my client in that.”

Tale of two wards

The Toronto Star compared City of Toronto ward demographics for voting-age adults with ward data provided by the Municipal Property Assessment Corporation from its list of eligible voters — the same list that serves as a starting point for the selection of jurors.

Of the 17 wards examined, most in the old city of Toronto, two stand out.



In Ward 32, which includes the tony Beach neighbourhood, a Star analysis found the difference between the number of voting-age adults living there and the total on MPAC’s list was the smallest, with a 13 per cent variation.

In Ward 11, which includes the neighbourhoods of Weston and Mount Dennis and is among the poorest areas of the city, the difference was the largest, with a variation of nearly 95 per cent.

Behind the numbers

MPAC database total

Ward 32		37,379
Ward 11	2,209	

Eligible jurors in ward

Ward 32		42,955
Ward 11		41,545

Per cent missing from MPAC

Ward 32 13.0%

Ward 11

94.7%

340

Ward demographic comparison

Households

Ward 32

25,685

Ward 11

24,805

Average household income

Ward 32

\$123,149

Ward 11

\$65,479

Living in highrises of five or more stories

Ward 32

14%

Ward 11

42%

Visible minority

Ward 32

24.4%

Ward 11

55.0%

University degree

Ward 32

89.9%

Ward 11

31.9%

University educated

Ward 32

92.1%

Ward 11

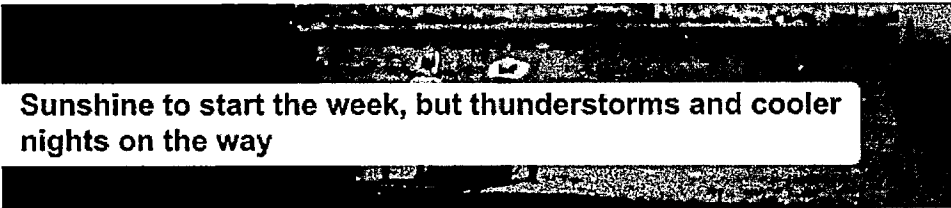
34.5%

Source: MPAC; Statistics Canada, 2016 Census

Toronto Star Graphic

Read more about: Brampton, Census





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TAB 13

Court File No.: CV-18-00603633-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N :

**CHRIS MOISE and ISH ADERONMU and PRABHA KHOSLA on her own behalf and
on behalf of all members of Women Win TO**

Applicants

- and -

**ATTORNEY GENERAL OF ONTARIO and
THE CORPORATION OF THE CITY OF TORONTO**

Respondents

APPLICATION under Rule 14.05(3)(g.1) of the *Rules of Civil Procedure*, RRO 1990, Reg 194

**AFFIDAVIT OF JAMAAL MYERS
(Sworn August 21, 2018)**

I, Jamaal Myers, of the City of Toronto, MAKE OATH AND SAY:

1. I am a resident of the City of Toronto. I have also been very involved in the 2018 municipal election as the campaign manager for Cheryl Lewis-Thurab, and with a slate of progressive candidates known as 'Scarborough Moves.' For these reasons, I have direct knowledge of the matters to which I depose in this affidavit. Where the information in this affidavit is not based on my direct knowledge, but is based upon information and belief from other sources, I have stated the source of that information and I believe the information to be true.

Background

2. I currently live in Scarborough close to the 401 Highway and Neilson Avenue in what is now Ward 43, Scarborough East. My current City Councillor is Paul Ainslie. I intend to vote in the 2018 municipal election in Toronto.

3. I recently moved back to Toronto from New York. I had lived in New York for 7.5 years. I studied at New York University School of Law and practiced corporate law in the New York offices of two international law firms.

Bill 5 and Recent Changes to Municipal Ward Boundaries in Scarborough

4. In the 2014 municipal election the following councillors were elected to the ten wards in Scarborough:

- (a) Ward 35 – Scarborough Southwest – Michelle Berardinetti
- (b) Ward 36 – Scarborough Southwest – Gary Crawford
- (c) Ward 37 – Scarborough Centre – Michael Thompson
- (d) Ward 38 – Scarborough Centre – Glenn De Baeremaeker
- (e) Ward 39 – Scarborough Agincourt – Mike Del Grande
- (f) Ward 40 – Scarborough Agincourt – Norm Kelly
- (g) Ward 41 – Scarborough-Rouge River – Chin Lee
- (h) Ward 42 – Scarborough-Rouge River – Raymond Cho
- (i) Ward 43 – Scarborough East – Paul Ainslie
- (j) Ward 44 – Scarborough East – Ron Moeser

5. In 2013, Toronto began reviewing its ward boundaries. As a result of that process, the ward boundaries in Scarborough were re-drawn in 2017. The 47 ward structure was supposed

to apply to the city's 2018 municipal election. Under the 47 ward structure, there would still be 10 wards in Scarborough: Ward 38 – Ward 47:

- (a) Ward 38
- (b) Ward 39
- (c) Ward 40
- (d) Ward 41
- (e) Ward 42
- (f) Ward 43
- (g) Ward 44
- (h) Ward 45
- (i) Ward 46
- (j) Ward 47

6. As a result of Bill 5, the 2018 municipal election will be conducted based on the federal and provincial ridings for Scarborough. Under the 25 ward structure, there will only be six wards in Scarborough. Those wards are:

- (a) Ward 20 – Scarborough Southwest
- (b) Ward 21 – Scarborough Centre
- (c) Ward 22 – Scarborough-Agincourt
- (d) Ward 23 – Scarborough North
- (e) Ward 24 – Scarborough-Guildwood
- (f) Ward 25 – Scarborough-Rouge Park

7. As will be further discussed below, I was campaigning in Ward 45 for Cheryl Lewis-Thurab. As a result of Bill 5, Ward 45 will be combined with Ward 47 (both described at paragraph 5 above) to form Ward 25 – Scarborough-Rouge Park.

8. Ward 45, the ward I was campaigning in for Cheryl Lewis-Thurab, has a very high percentage of racialized or visible minority, low income, and immigrant residents. Based on my experiences as a Scarborough resident, my experiences campaigning in this municipal election, and my knowledge of official statistics about the demographics of Ward 45, I believe that Ward 45 has one of the highest percentages of racialized or visible minority residents in Toronto. Ward 45 includes areas such as Malvern which have high proportions of racialized and immigrant residents. Attached to my affidavit and marked as **Exhibit "A"** are excerpts of the City of Toronto's demographic report for Ward 45.

9. In contrast to the demographics of Ward 45, the population demographics of Ward 47 are older and wealthier. Based on my experiences as a Scarborough resident, and my knowledge of official statistics about the demographics of Ward 47, which runs along Lake Ontario just west of the border with the City of Pickering, Ward 47 is one of the parts of Scarborough with the highest proportion of white residents. Attached to my affidavit and marked as **Exhibit "B"** are excerpts of the City of Toronto's demographic reports for Ward 47.

10. I expect that combining Ward 45 with Ward 47 will result in the voices of one of the two contrasting demographics of the wards being diluted. Based on my experience and knowledge with municipal elections and voter turnout, I am concerned that it is more likely that the voices of the residents of Ward 45, who are racialized and lower-income, will be diluted when the wards are combined.

My Political Activity During the 2018 Municipal Election

Involvement with 'Scarborough Moves'

11. During the 2018 Municipal Election campaign in Toronto, I have been coordinating and supporting a slate of progressive city council candidates in Scarborough. The slate 'Scarborough Moves' began forming in May 2018. I looked at the candidates running in each ward after the nominations opened in May 2018, and started reaching out to candidates with progressive platforms, particularly with respect to public transit – a key issue in Scarborough this municipal election. I hoped that 'Scarborough Moves' could offer collective support for progressive minded candidates in Scarborough, as well as support fresh voices from communities that are historically underrepresented on City Council. 'Scarborough Moves' is not a formal organization. However, as a campaign organizer, my hope was that by associating a slate of candidates, they would each be able to increase their visibility, name recognition, and would benefit from common progressive branding. A copy of tweets made on Twitter under the hashtag '#ScarboroughMoves' is attached to this affidavit and marked as **Exhibit "C"**.

12. A common policy platform amongst 'Scarborough Moves' candidates is that they all support a comprehensive Light Rail Transit (LRT) network over the single stop Scarborough subway extension. Candidates running under the 'Scarborough Moves' slate include:

- (a) Suman Roy, Ward 39
- (b) Alex Wilson, Ward 40
- (c) Cheryl Lewis-Thurab, Ward 45

(d) Reza Khoshdel, Ward 47

These ward references are to the 47-ward system. Three of the above candidates are people of colour, and one of them is a women of colour. A copy of the 'Scarborough Moves' platform and information about the candidates is attached to this affidavit and marked as **Exhibit "D."**

13. I have also been involved with Scarborough Transit Action, a group that advocates for LRT in Scarborough, which most incumbent councillors in Scarborough oppose. All members of 'Scarborough Moves' support building the 50-stop LRT Network instead of the one-stop subway. Key members of Scarborough Transit Action have met with candidates on the 'Scarborough Moves' slate.

14. As I will discuss further below, two of the candidates associated with 'Scarborough Moves,' Cheryl Lewis-Thurab and Reza Khoshdel, will now have to run against each other in the new Ward 25 because of the changes imposed by Bill 5 during the election campaign. Forcing our candidates to run against each other has greatly interfered with our ability to endorse one candidate in each municipal ward, and thereby put forward a slate of progressive candidates to all Scarborough voters.

Working on Cheryl Lewis-Thurab's Campaign

15. In addition to my involvement with 'Scarborough Moves,' I have also been involved with the municipal election as Cheryl Lewis-Thurab's campaign manager. Lewis-Thurab is a candidate in what is now Ward 45 (as referred to in paragraph 5 above).

16. Lewis-Thurab and I connected after we met at a 'Democracy Kit' training for potential city council candidates. The training was a one day boot camp open to anyone interested in

running for office or that was interested in working on a municipal campaign. Democracy Kit is an organization that offers election campaign resources for potential municipal leaders which includes training on campaign fundamentals and getting out the vote.

17. I attended the 'Democracy Kit' training because I had recently returned to Toronto and was interested in becoming involved in municipal politics. At the time, Lewis-Thurab and I were both considering a candidacy for Ward 45. Although the incumbent councillor for Ward 45, Neethan Shan, was running in the 2018 election, we did not view him as a strong incumbent because he was elected relatively recently in February 2017 in a by-election.

18. In May of 2018, I decided not to run in the city council election, but to support Lewis-Thurab's candidacy instead. In part, I made this decision because Lewis-Thurab was involved in an organization called Women Win TO ("WWTO"), and was in the process of completing a training program for women intending to run for elected office through that organization. WWTO is an organization seeking improve the representation of women, be they racialized and Indigenous women, trans, and gender non-conforming persons on City Council. I understand that WWTO was seeking to help women candidates for City Council overcome the significant systemic barriers that these candidates face in getting elected to City Council.

19. Since Lewis-Thurab was associated with WWTO and was almost finished with their training, I also decided to support her campaign and serve as Cheryl's campaign manager. I made this decision because Lewis-Thurab went through the WWTO training and had access to a wealth of campaign resources and materials, including best practices for crafting a campaign narrative, successful fundraising initiatives, stakeholder engagement, media and communications, and data management. I believed that because of Lewis-Thurab's

experiences with WWTO, and her attendance at trainings led by experts in campaigning for municipal office, Lewis-Thurab stood a good chance of running a successful and engaging campaign in Ward 45.

20. Lewis-Thurab is a Black woman, an immigrant, a single mother, and has 20 years of experience working in the non-profit sector, including as a Fundraising Manager for United Way. Currently, City Council does not reflect Toronto's diversity or people with Lewis-Thurab's life experiences. There are only 6 racialized councillors, only one of whom is a racialized woman, and less than a third of Council are women. Further, there are no Black, Indigenous, trans, or disabled women on Toronto City Council.

21. I decided to serve as Lewis-Thurab's campaign manager because I wanted to be part of electing the first Black woman to Toronto's City Council. I believe that the City's policies, programs, and budgeting will better serve and reflect the diverse residents of Scarborough when City Councillors are reflective of the diversity of the city's residents.

22. In May 2018, Lewis-Thurab registered as a candidate for Ward 45. In preparation for the election in October 2018, Lewis-Thurab and I were involved in organizing meetings for the campaign, and attending community events in the ward to understand what issues constituents were talking about and interested in. In the early stages of the campaign, Lewis-Thurab, her daughters, Cheronne Thurab and Cherisse Thurab, and I were involved in her campaign. Later, another volunteer, Brian Cheung, began assisting with operations. Lewis-Thurab and I met Cheung at an LRT workshop that I was facilitating in the Lawrence East area. In particular, Cheung assisted us with Nation Builder, a data management software for candidates which helps create "walk sheets." Walk sheets break a particular area into 30 to 40

houses and are helpful for canvassing in a ward. We estimated that we reached roughly 2,000 homes by mid-August.

23. Our campaign has been fundraising since July. However, compared to incumbent candidates and other campaigns, our campaign has a much more limited access to financial resources. Although our campaign's resources were limited, our campaign did enjoy the advantage of Lewis-Thurab's specialized training through WWTO, where she learned how to conduct a successful municipal campaign while competing with candidates with more financial support.

Impact of Combining Wards on Lewis-Thurab's Election Campaign

24. As I discussed above, in addition to serving as Lewis-Thurab's campaign manager, I have also been very involved with other progressive candidates who are part of the 'Scarborough Moves' progressive slate. One of these candidates is Reza Khoshdel, who is running in what is now Ward 47. Because Khoshdel is part of the same slate of progressive candidates, I arranged for Lewis-Thurab and Khoshdel to jointly launch their campaigns. I was excited by the prospect of both Lewis-Thurab and Khoshdel being successful in this election because of their support for progressive policies and values. In addition, as I stated above, if elected, Lewis-Thurab would be the first Black woman to serve on City Council, and Khoshdel would be the first Iranian. A copy of a promotional poster for Lewis-Thurab and Khoshdel's joint campaign launch is marked as **Exhibit "E"** to this affidavit. Posters and other literature like this one are unfortunately no longer useable as a result of the changes imposed by Bill 5.

25. The changes imposed by Bill 5 mid-way through the campaign period will mean that Lewis-Thurab and Khoshdel are now running against each other in the new Ward 25, Scarborough-Rouge Park. I expect that either Lewis-Thurab or Khoshdel will have to drop out of the election campaign because it would defeat the purpose of the 'Scarborough Moves' progressive slate to have two candidates running against each other, and because they would likely appeal to the same supporters.

26. Furthermore, Lewis-Thurab's campaign currently lacks the resources and capacity to run a campaign in both Ward 45 and Ward 47, because this was entirely unplanned for. At this stage of the campaign, we had yet to complete canvassing Ward 45, and it would be very difficult for us to start from scratch in Ward 47, given the limited time remaining in the campaign period. In addition, Lewis-Thurab does not currently have many contacts in Ward 47. Further, Lewis-Thurab had specifically selected Ward 45 as the area she was going to run in because it was where her community contacts and networks were. She currently lives in Ward 45.

27. Lewis-Thurab's campaign also incurred expenses for printing materials, which are now useless because the materials we had printed clearly stated that she was running in "Ward 45". Our campaign was already working with a limited budget and donors. Our limited financial resources make it particularly difficult for us to respond to the change in ward boundaries, especially because we had no notice that this change was even being considered.

28. It is an uphill battle to unseat incumbents in municipal politics. Incumbents enjoy name recognition, and because of the nature of municipal services, frequently interact with their constituents. In order to successfully campaign as a new candidate in municipal politics,

a candidate must raise sufficient funds, and have enough resources to campaign effectively across the ward. Candidates must achieve name recognition across a ward by being a visible presence at community events, and meetings.

29. The new ward boundaries, imposed more than halfway through the municipal election period, make it very difficult to campaign effectively for Lewis-Thurab, and to manage her campaign, because the size of the ward has doubled, and includes a large geographic area where we have limited contacts and have done no canvassing. We were not planning on running a campaign in Ward 47, and now we cannot succeed, or be a competitive force in this campaign without a massive effort of canvassing, door-knocking, and attending community events in Ward 47, which will require resources that are beyond us. We would require far more resources to campaign in both wards, expenses that our campaign had not planned for, and does not have access to.

30. Even though Lewis-Thurab filed her nomination several months ago, and has been actively campaigning, Bill 5 has turned the election upside down and it feels like we have to start from scratch – two months from the election date.

Impact of Bill 5 on Women Candidates

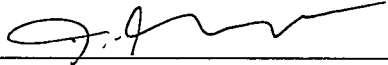
31. As a result of Bill 5 combining municipal wards, I have noticed more women candidates dropping out of the municipal election, or considering dropping out. Based on my observations, women candidates, especially racialized women, are having a more difficult time responding to the change in boundaries because additional challenges and demands have suddenly been imposed on their limited resources.

32. I swear this affidavit in support of the Applicants' application and for no other or improper purpose.

SWORN AFFIRMED BEFORE ME at the City of Toronto, this 21 day of August, 2018.



A Commissioner for taking Affidavits (*or as may be*)

} 

JAMAAL MYERS

EXHIBIT A

Ward 45

City of Toronto Ward Profiles

2016 Census

Population Highlights

2018 Wards

Ward Population **63,585**

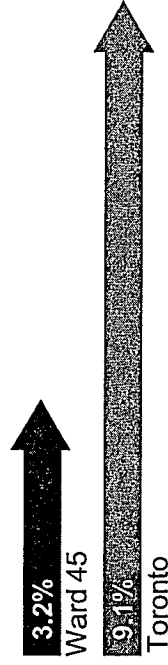
Population Growth (2011-2016) **-0.8%**

Median Age **37.9**

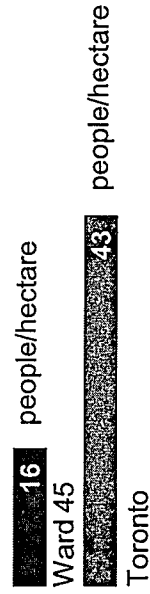
Population Growth (2011-2016)



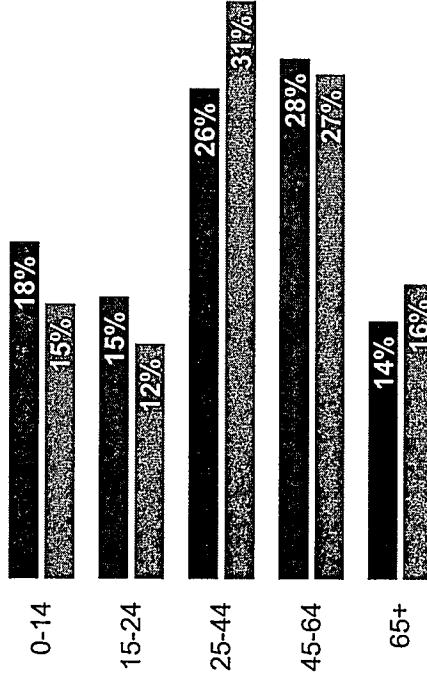
Population Growth (2006-2016)



Density

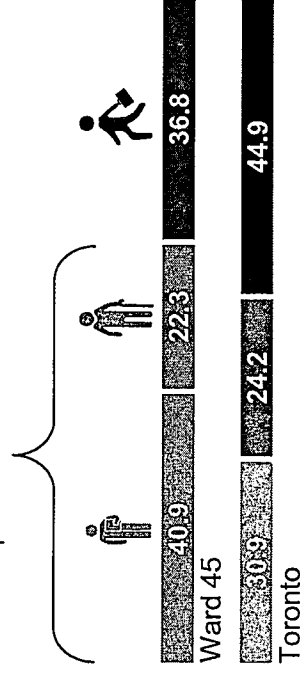


Population by Age Group



Dependency Ratio

senior and youth dependents
for every 100 working age
persons



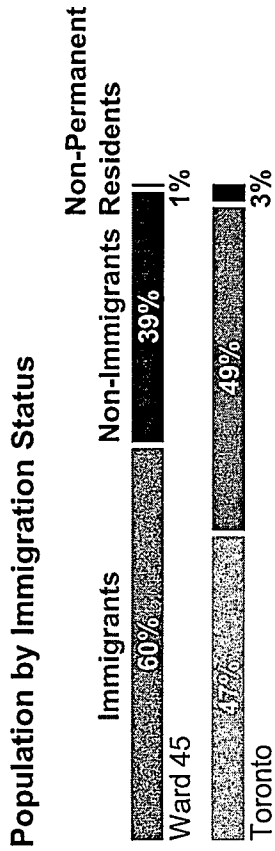
This is Exhibit "A" referred to in the affidavit of **JAMMAL MYERS** sworn before me, this **21** day of **August**, 20**18**.

[Signature]
A COMMISSIONER, ETC.

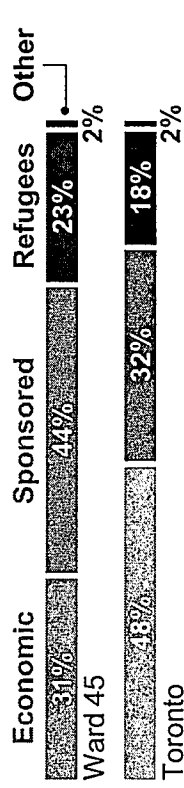
Ward 45 City of Toronto Ward Profiles 2016 Census

Immigration & Mobility Highlights 2018 Wards

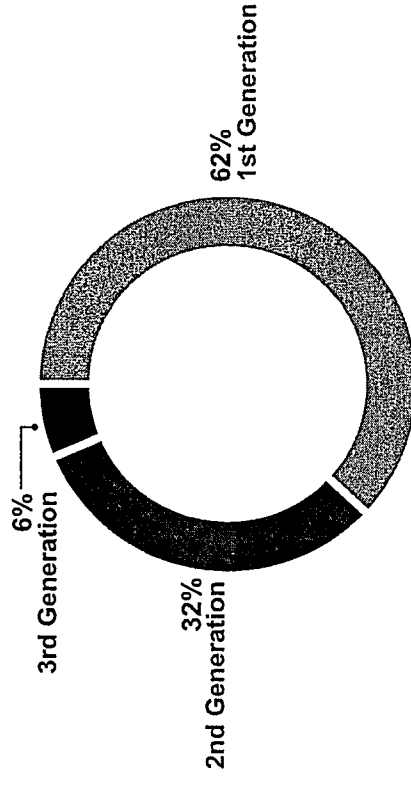
Immigrant Population **38,190**



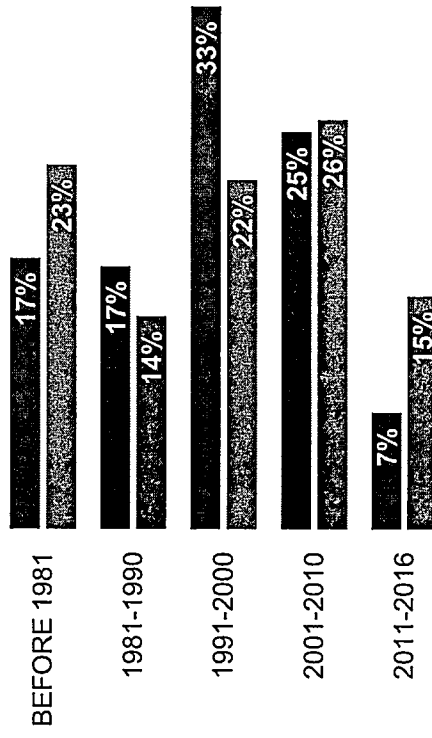
Immigration by Admission Category



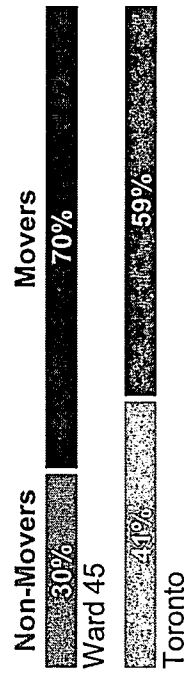
Immigration by Generation



Period of Immigration



Mobility Status, 5 Year



Ward 45

City of Toronto Ward Profiles 2016 Census

2018 Wards
Effective December 1, 2018

Migration, Mobility & Languages

[Migration, Mobility & Languages Glossary](#) ⓘ

Population by Generation Status and Period of Immigration

Ward 45		
Generation Status	2016	%
1st generation	39,285	61.9%
2nd generation	20,145	31.8%
3rd generation and over	4,015	6.3%
Total Population	63,445	100.0%

Toronto		
	2016	%
	1,377,465	51.2%
	740,180	27.5%
	574,025	21.3%
Total	2,691,670	100.0%

Period of Immigration	2016	%
Before 1981	6,585	17.2%
1981 to 1990	6,385	16.7%
1991 to 2000	12,695	33.2%
2001 to 2010	9,670	25.3%
2001 to 2005	5,085	13.3%
2006 to 2010	4,585	12.0%
2011 to 2016	2,855	7.5%
Total Immigrant Population	38,190	100.0%

	2016	%
	294,065	23.2%
	171,565	13.6%
	281,870	22.3%
	330,550	26.1%
	162,770	12.9%
	167,780	13.3%
	187,950	14.8%
Total	1,266,000	100.0%

Admission Category and Applicant Type for Immigration Period, 1980 to 2016

Ward 45		
Admission Category	2016	%
Economic immigrants	9,995	31.2%
Principal applicants	4,465	13.9%
Secondary applicants	5,530	17.2%
Immigrants sponsored by family	14,030	43.7%
Refugees	7,490	23.4%
Other Immigrants	560	1.7%
Immigrant Population, 1980 to 2016	32,075	100.0%

Toronto		
	2016	%
	475,155	48.1%
	201,860	20.4%
	273,295	27.7%
	320,945	32.5%
	176,120	17.8%
	16,105	1.6%
Total	988,325	100.0%

Ward 45

City of Toronto Ward Profiles

2016 Census

2018 Wards

Effective December 1, 2018

Population by Immigrant Status and Top Ten Places of Birth

357

Ward 45	2016	%	Toronto	2016	%
Sri Lanka	10,540	16.6%	China	131,475	4.9%
Philippines	4,850	7.6%	Philippines	118,775	4.4%
India	4,130	6.5%	India	79,225	2.9%
Guyana	3,500	5.5%	Sri Lanka	52,900	2.0%
Jamaica	3,110	4.9%	Italy	45,520	1.7%
Pakistan	1,505	2.4%	Jamaica	45,075	1.7%
Trinidad and Tobago	1,425	2.2%	United Kingdom	40,295	1.5%
China	860	1.4%	Hong Kong	38,825	1.4%
Hong Kong	685	1.1%	Portugal	38,570	1.4%
Bangladesh	595	0.9%	Iran	36,440	1.4%
All Others	6,995	11.0%	All Others	638,900	23.7%
Total Immigrants	38,195	60.2%	Total Immigrants	1,266,000	47.0%
Non-immigrants	24,445	38.5%	Non-immigrants	1,332,090	49.5%
Non-permanent residents	805	1.3%	Non-permanent residents	93,580	3.5%
Total Population	63,445	100.0%	Total Population	2,691,670	100.0%

Note: Places of Birth are Countries as defined by Statistics Canada.

The category "All Others" includes "Other places of birth" in each continent.

Top Ten Recent Immigrants by Place of Birth

Ward 45	2016	%	Toronto	2016	%
Sri Lanka	705	24.7%	Philippines	31,730	16.9%
Philippines	505	17.7%	China	23,200	12.3%
India	355	12.4%	India	20,100	10.7%
Jamaica	155	5.4%	Iran	10,935	5.8%
Pakistan	130	4.6%	Pakistan	6,725	3.6%
Syria	115	4.0%	Bangladesh	5,795	3.1%
China	85	3.0%	Sri Lanka	4,355	2.3%
Bangladesh	70	2.5%	United States	4,015	2.1%
Afghanistan	60	2.1%	Iraq	3,715	2.0%
United States	55	1.9%	Jamaica	3,525	1.9%
All Others	620	21.7%	All Others	73,855	39.3%
Total Recent Immigrants	2,855	100.0%	Total Recent Immigrants	187,950	100.0%

Note: Places of Birth are Countries as defined by Statistics Canada.

The Top Ten excludes "Other places of birth" in each continent.

Ward 45

City of Toronto Ward Profiles

2016 Census

2018 Wards

Effective December 1, 2018

Population by Mobility Status

Ward 45			Toronto	
Mobility Status (1 Year)	2016	%	2016	%
Non-movers	57,070	90.9%	2,284,060	85.8%
Movers	5,735	9.1%	379,490	14.2%
Non-migrants	4,095	6.5%	253,780	9.5%
Migrants	1,640	2.6%	125,715	4.7%
Internal migrants	800	1.3%	65,770	2.5%
Intraprovincial migrants	700	1.1%	49,995	1.9%
Interprovincial migrants	100	0.2%	15,780	0.6%
External migrants	835	1.3%	59,945	2.3%
Total population 1 year ago	62,805	100.0%	2,663,550	100.0%

Ward 45			Toronto	
Mobility Status (5 Years)	2016	%	2016	%
Non-movers	42,225	70.2%	1,516,110	59.3%
Movers	17,925	29.8%	1,040,010	40.7%
Non-migrants	13,175	21.0%	639,060	24.0%
Migrants	4,755	7.6%	400,955	15.1%
Internal migrants	2,390	3.8%	184,120	6.9%
Intraprovincial migrants	2,015	3.2%	141,130	5.3%
Interprovincial migrants	375	0.6%	42,985	1.6%
External migrants	2,360	3.8%	216,835	8.1%
Total population 5 years ago	60,150	100.0%	2,556,120	100.0%

Mother Tongue Languages

Ward 45			Toronto		
	2016	%		2016	%
English	31,525	52.2%	English	1,370,490	52.9%
French	470	0.8%	French	33,960	1.3%
Aboriginal languages	-	0.0%	Aboriginal languages	290	0.0%
Other	28,360	47.0%	Other	1,183,735	45.7%
Total Single Responses	60,355	100.0%	Total Single Responses	2,588,475	100.0%
No Knowledge of English or French	2,500	3.9%	No Knowledge of English or French	131,885	4.9%

Adapted from Statistics Canada, Census 2016, 2011 & 2006.

For definition of variables, refer to Glossary.

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Ward 45

City of Toronto Ward Profiles 2016 Census

2018 Wards
Effective December 1, 2018

Top Ten Mother Tongue Languages

Ward 45	2016	%
Single Response	60,355	95.1%
English	31,525	49.7%
Tamil	11,815	18.6%
Tagalog (Pilipino, Filipino)	3,785	6.0%
Urdu	1,730	2.7%
Gujarati	1,590	2.5%
Cantonese	1,450	2.3%
Punjabi (Panjabi)	1,070	1.7%
Bengali	665	1.0%
Spanish	530	0.8%
Persian (Farsi)	530	0.8%
Others	5,665	8.9%
Multiple Responses	3,095	4.9%
Total	63,450	100.0%

Toronto	2016	%
Single Response	2,588,475	96.2%
English	1,370,490	50.9%
Cantonese	115,245	4.3%
Mandarin	110,635	4.1%
Tagalog (Pilipino, Filipino)	84,440	3.1%
Spanish	72,045	2.7%
Italian	62,715	2.3%
Portuguese	59,370	2.2%
Tamil	56,720	2.1%
Persian (Farsi)	49,250	1.8%
Urdu	36,950	1.4%
Others	570,615	21.2%
Multiple Response	103,190	3.8%
Total	2,691,665	100.0%

Top Ten Home Languages

Ward 45	2016	%
Single Response	55,310	87.2%
English	36,460	57.5%
Tamil	8,950	14.1%
Tagalog (Pilipino, Filipino)	1,960	3.1%
Cantonese	1,210	1.9%
Urdu	1,120	1.8%
Gujarati	1,040	1.6%
Punjabi (Panjabi)	710	1.1%
Bengali	490	0.8%
Mandarin	345	0.5%
Spanish	290	0.5%
Others	2,735	4.3%
Multiple Responses	8,135	12.8%
Total	63,445	100.0%

Toronto	2016	%
Single Response	2,448,750	91.0%
English	1,732,595	64.4%
Mandarin	87,505	3.3%
Cantonese	83,915	3.1%
Tagalog (Pilipino, Filipino)	44,080	1.6%
Spanish	41,395	1.5%
Tamil	40,850	1.5%
Portuguese	33,715	1.3%
Persian (Farsi)	33,670	1.3%
Italian	26,710	1.0%
Korean	23,570	0.9%
Others	300,745	11.2%
Multiple Responses	242,920	9.0%
Total	2,691,670	100.0%

Ward 45

City of Toronto Ward Profiles

2016 Census

2018 Wards

Effective December 1, 2018

Ethnocultural

[Ethnocultural Glossary](#) ⓘ

Top Ten Ethnic Origin Groups

360

Ward 45	2016	%
East Indian	12,885	15.3%
Sri Lankan	11,720	13.9%
Filipino	7,150	8.5%
Jamaican	6,060	7.2%
Canadian	5,245	6.2%
Chinese	4,115	4.9%
Tamil	3,825	4.5%
English	2,555	3.0%
Guyanese	1,920	2.3%
Scottish	1,885	2.2%
Other Ethnic Origins	26,845	31.9%
Total Ethnic Origins Reported	84,205	100.0%

Toronto	2016	%
Chinese	332,825	7.9%
English	331,890	7.9%
Canadian	323,175	7.7%
Irish	262,960	6.2%
Scottish	256,250	6.1%
East Indian	202,675	4.8%
Italian	182,495	4.3%
Filipino	162,605	3.9%
German	130,900	3.1%
French	122,610	2.9%
Other Ethnic Origins	1,914,445	45.3%
Total Ethnic Origins Reported	4,222,830	100.0%

Note: Multiple responses are counted individually.

Total Visible Minority Population

Ward 45	2016	%
Total Visible Minorities	57,210	90.2%
South Asian	28,935	45.6%
Black	11,405	18.0%
Filipino	6,720	10.6%
Chinese	2,870	4.5%
Latin American	890	1.4%
West Asian	860	1.4%
Arab	525	0.8%
Southeast Asian	360	0.6%
Korean	75	0.1%
Japanese	45	0.1%
Visible minority, n.i.e.	2,445	3.9%
Multiple visible minorities	2,080	3.3%
All Others	6,235	9.8%
Total	63,445	100.0%

Toronto	2016	%
Total Visible Minorities	1,385,850	51.5%
South Asian	338,960	12.6%
Chinese	299,465	11.1%
Black	239,855	8.9%
Filipino	152,715	5.7%
Latin American	77,165	2.9%
West Asian	60,320	2.2%
Southeast Asian	41,650	1.5%
Korean	41,640	1.5%
Arab	36,030	1.3%
Japanese	13,410	0.5%
Visible minority, n.i.e.	36,975	1.4%
Multiple visible minorities	47,670	1.8%
All Others	1,305,815	48.5%
Total	2,691,665	100.0%

Note: n.i.e. refers to "not included elsewhere".

Adapted from Statistics Canada, Census 2016, 2011 & 2006.

For definition of variables, refer to Glossary.

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EXHIBIT B

Ward 47

City of Toronto Ward Profiles

2016 Census

Population Highlights

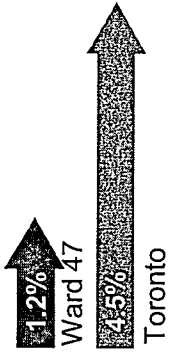
2018 Wards

Ward Population **49,230**

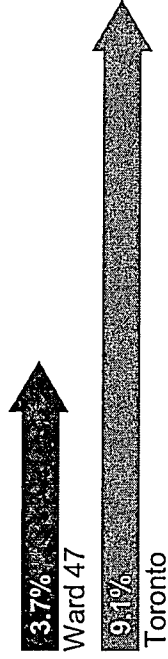
Population Growth (2011-2016) **1.2%**

Median Age **43.5**

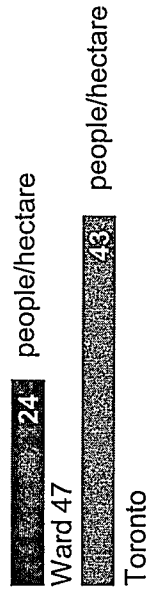
Population Growth (2011-2016)



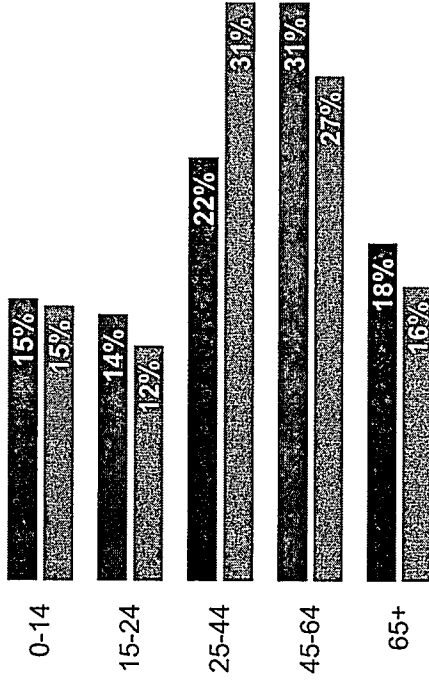
Population Growth (2006-2016)



Density

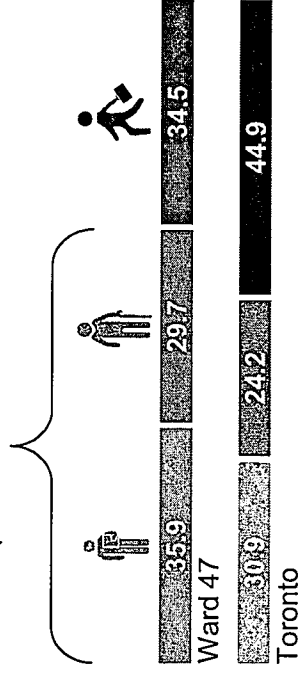


Population by Age Group



Dependency Ratio

senior and youth dependents for every 100 working age persons



This is Exhibit "B" referred to in the affidavit of Jamael Myers sworn before me, this 21 day of August, 2018

A COMMISSIONER, ETC.

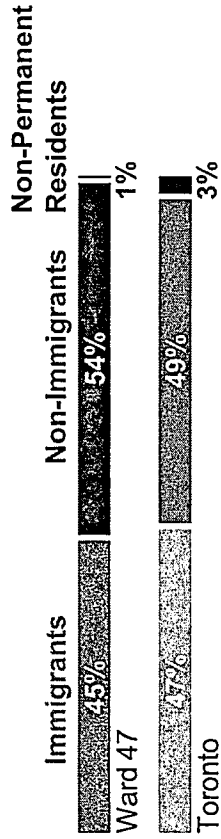
Ward 47

City of Toronto Ward Profiles
2016 Census

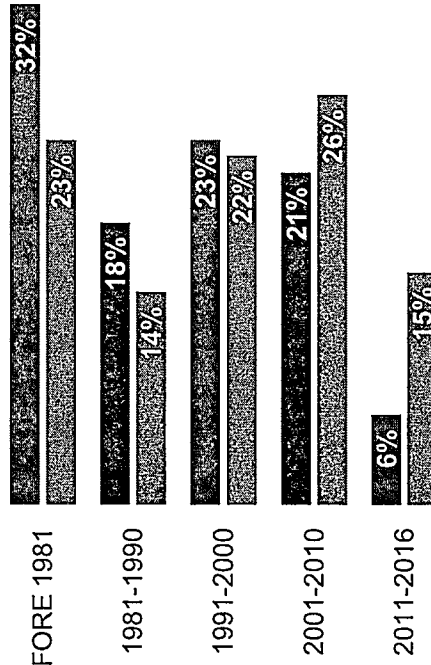
Immigration & Mobility Highlights
2018 Wards

Immigrant Population **21,995**

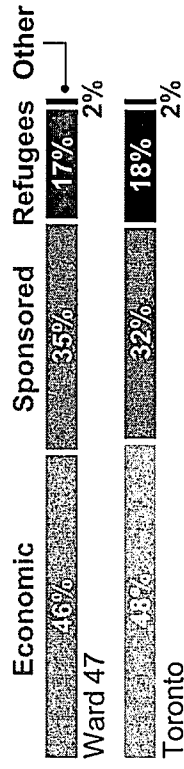
Population by Immigration Status



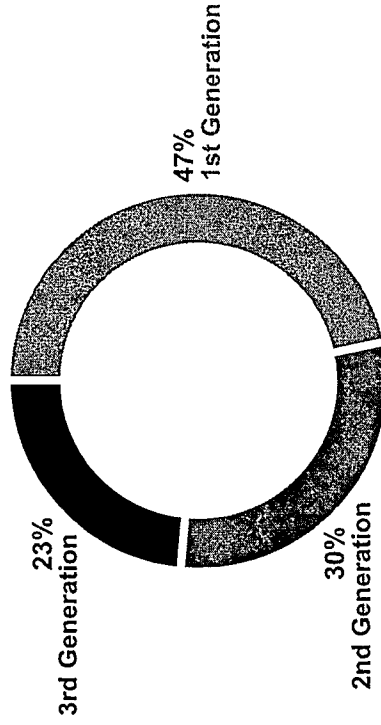
Period of Immigration



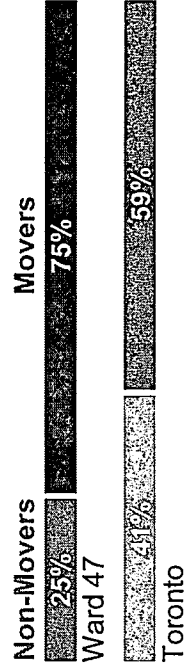
Immigration by Admission Category



Immigration by Generation



Mobility Status, 5 Year



Ward 47

City of Toronto Ward Profiles

2016 Census

2018 Wards

Effective December 1, 2018

Migration, Mobility & Languages

[Migration, Mobility & Languages Glossary](#) ⓘ

Population by Generation Status and Period of Immigration

363

Ward 47			Toronto	
Generation Status	2016	%	2016	%
1st generation	22,705	46.7%	1,377,465	51.2%
2nd generation	14,465	29.7%	740,180	27.5%
3rd generation and over	11,455	23.6%	574,025	21.3%
Total Population	48,625	100.0%	2,691,670	100.0%

Ward 47			Toronto	
Period of Immigration	2016	%	2016	%
Before 1981	6,990	31.8%	294,065	23.2%
1981 to 1990	3,955	18.0%	171,565	13.6%
1991 to 2000	5,115	23.3%	281,870	22.3%
2001 to 2010	4,665	21.2%	330,550	26.1%
2001 to 2005	2,535	11.5%	162,770	12.9%
2006 to 2010	2,140	9.7%	167,780	13.3%
2011 to 2016	1,270	5.8%	187,950	14.8%
Total Immigrant Population	21,995	100.0%	1,266,000	100.0%

Admission Category and Applicant Type for Immigration Period, 1980 to 2016

Ward 47			Toronto	
Admission Category	2016	%	2016	%
Economic immigrants	7,120	46.4%	475,155	48.1%
Principal applicants	2,775	18.1%	201,860	20.4%
Secondary applicants	4,350	28.3%	273,295	27.7%
Immigrants sponsored by family	5,320	34.7%	320,945	32.5%
Refugees	2,650	17.3%	176,120	17.8%
Other Immigrants	255	1.7%	16,105	1.6%
Immigrant Population, 1980 to 2016	15,345	100.0%	988,325	100.0%

Adapted from Statistics Canada, Census 2016, 2011 & 2006.

For definition of variables, refer to Glossary.

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Ward 47

City of Toronto Ward Profiles

2016 Census

2018 Wards

Effective December 1, 2018

Population by Immigrant Status and Top Ten Places of Birth

Ward 47	2016	%	Toronto	2016	%
Philippines	2,440	5.0%	China	131,475	4.9%
Sri Lanka	2,425	5.0%	Philippines	118,775	4.4%
India	2,295	4.7%	India	79,225	2.9%
Guyana	1,655	3.4%	Sri Lanka	52,900	2.0%
Jamaica	1,465	3.0%	Italy	45,520	1.7%
United Kingdom	1,230	2.5%	Jamaica	45,075	1.7%
Bangladesh	805	1.7%	United Kingdom	40,295	1.5%
Trinidad and Tobago	770	1.6%	Hong Kong	38,825	1.4%
China	735	1.5%	Portugal	38,570	1.4%
Italy	580	1.2%	Iran	36,440	1.4%
All Others	7,595	15.6%	All Others	638,900	23.7%
Total Immigrants	21,995	45.2%	Total Immigrants	1,266,000	47.0%
Non-immigrants	26,110	53.7%	Non-immigrants	1,332,090	49.5%
Non-permanent residents	520	1.1%	Non-permanent residents	93,580	3.5%
Total Population	48,625	100.0%	Total Population	2,691,670	100.0%

Note: Places of Birth are Countries as defined by Statistics Canada.

The category "All Others" includes "Other places of birth" in each continent.

Top Ten Recent Immigrants by Place of Birth

Ward 47	2016	%	Toronto	2016	%
Philippines	300	23.7%	Philippines	31,730	16.9%
India	180	14.2%	China	23,200	12.3%
Sri Lanka	170	13.4%	India	20,100	10.7%
Bangladesh	100	7.9%	Iran	10,935	5.8%
China	50	4.0%	Pakistan	6,725	3.6%
Jamaica	50	4.0%	Bangladesh	5,795	3.1%
Haiti	35	2.8%	Sri Lanka	4,355	2.3%
Nigeria	30	2.4%	United States	4,015	2.1%
United States	30	2.4%	Iraq	3,715	2.0%
United Kingdom	25	2.0%	Jamaica	3,525	1.9%
All Others	295	23.3%	All Others	73,855	39.3%
Total Recent Immigrants	1,265	100.0%	Total Recent Immigrants	187,950	100.0%

Note: Places of Birth are Countries as defined by Statistics Canada.

The Top Ten excludes "Other places of birth" in each continent.

Ward 47

City of Toronto Ward Profiles 2016 Census

2018 Wards
Effective December 1, 2018

Population by Mobility Status

Ward 47			Toronto	
Mobility Status (1 Year)	2016	%	2016	%
Non-movers	44,640	92.5%	2,284,060	85.8%
Movers	3,620	7.5%	379,490	14.2%
Non-migrants	2,640	5.5%	253,780	9.5%
Migrants	975	2.0%	125,715	4.7%
Internal migrants	650	1.3%	65,770	2.5%
Intraprovincial migrants	530	1.1%	49,995	1.9%
Interprovincial migrants	120	0.2%	15,780	0.6%
External migrants	325	0.7%	59,945	2.3%
Total population 1 year ago	48,260	100.0%	2,663,550	100.0%

Ward 47			Toronto	
Mobility Status (5 Years)	2016	%	2016	%
Non-movers	34,795	74.9%	1,516,110	59.3%
Movers	11,690	25.1%	1,040,010	40.7%
Non-migrants	8,745	18.1%	639,060	24.0%
Migrants	2,945	6.1%	400,955	15.1%
Internal migrants	1,620	3.4%	184,120	6.9%
Intraprovincial migrants	1,405	2.9%	141,130	5.3%
Interprovincial migrants	215	0.4%	42,985	1.6%
External migrants	1,325	2.7%	216,835	8.1%
Total population 5 years ago	46,485	100.0%	2,556,120	100.0%

Mother Tongue Languages

Ward 47			Toronto	
	2016	%	2016	%
English	30,900	66.0%	1,370,490	52.9%
French	390	0.8%	33,960	1.3%
Aboriginal languages	-	0.0%	290	0.0%
Other	15,545	33.2%	1,183,735	45.7%
Total Single Responses	46,835	100.0%	2,588,475	100.0%
No Knowledge of English or French	755	1.6%	131,885	4.9%

Adapted from Statistics Canada, Census 2016, 2011 & 2006.

For definition of variables, refer to Glossary.

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Ward 47

City of Toronto Ward Profiles

2016 Census

2018 Wards

Effective December 1, 2018

Top Ten Mother Tongue Languages

366

Ward 47	2016	%
Single Response	46,835	96.3%
English	30,900	63.5%
Tamil	2,555	5.3%
Tagalog (Pilipino, Filipino)	1,650	3.4%
Cantonese	875	1.8%
Bengali	850	1.7%
Italian	825	1.7%
Mandarin	650	1.3%
Punjabi (Panjabi)	600	1.2%
Spanish	585	1.2%
Urdu	570	1.2%
Others	6,775	13.9%
Multiple Responses	1,795	3.7%
Total	48,630	100.0%

Toronto	2016	%
Single Response	2,588,475	96.2%
English	1,370,490	50.9%
Cantonese	115,245	4.3%
Mandarin	110,635	4.1%
Tagalog (Pilipino, Filipino)	84,440	3.1%
Spanish	72,045	2.7%
Italian	62,715	2.3%
Portuguese	59,370	2.2%
Tamil	56,720	2.1%
Persian (Farsi)	49,250	1.8%
Urdu	36,950	1.4%
Others	570,615	21.2%
Multiple Response	103,190	3.8%
Total	2,691,665	100.0%

Top Ten Home Languages

Ward 47	2016	%
Single Response	44,490	91.5%
English	36,540	75.1%
Tamil	1,655	3.4%
Tagalog (Pilipino, Filipino)	665	1.4%
Mandarin	515	1.1%
Bengali	510	1.0%
Cantonese	495	1.0%
Urdu	375	0.8%
Spanish	350	0.7%
Persian (Farsi)	295	0.6%
Punjabi (Panjabi)	275	0.6%
Others	2,815	5.8%
Multiple Responses	4,135	8.5%
Total	48,625	100.0%

Toronto	2016	%
Single Response	2,448,750	91.0%
English	1,732,595	64.4%
Mandarin	87,505	3.3%
Cantonese	83,915	3.1%
Tagalog (Pilipino, Filipino)	44,080	1.6%
Spanish	41,395	1.5%
Tamil	40,850	1.5%
Portuguese	33,715	1.3%
Persian (Farsi)	33,670	1.3%
Italian	26,710	1.0%
Korean	23,570	0.9%
Others	300,745	11.2%
Multiple Responses	242,920	9.0%
Total	2,691,670	100.0%

Ward 47

City of Toronto Ward Profiles

2016 Census

2018 Wards

Effective December 1, 2018

Ethnocultural

[Ethnocultural Glossary](#) ⓘ

367

Top Ten Ethnic Origin Groups

Ward 47	2016	%
English	7,330	9.4%
Canadian	7,295	9.3%
East Indian	6,425	8.2%
Irish	5,390	6.9%
Scottish	5,335	6.8%
Filipino	3,530	4.5%
Chinese	3,355	4.3%
Jamaican	2,985	3.8%
Sri Lankan	2,820	3.6%
Italian	2,760	3.5%
Other Ethnic Origins	31,050	39.7%
Total Ethnic Origins Reported	78,275	100.0%

Toronto	2016	%
Chinese	332,825	7.9%
English	331,890	7.9%
Canadian	323,175	7.7%
Irish	262,960	6.2%
Scottish	256,250	6.1%
East Indian	202,675	4.8%
Italian	182,495	4.3%
Filipino	162,605	3.9%
German	130,900	3.1%
French	122,610	2.9%
Other Ethnic Origins	1,914,445	45.3%
Total Ethnic Origins Reported	4,222,830	100.0%

Note: Multiple responses are counted individually.

Total Visible Minority Population

Ward 47	2016	%
Total Visible Minorities	27,165	55.9%
South Asian	11,095	22.8%
Black	5,765	11.9%
Filipino	3,275	6.7%
Chinese	2,445	5.0%
Latin American	770	1.6%
West Asian	580	1.2%
Arab	335	0.7%
Southeast Asian	280	0.6%
Korean	250	0.5%
Japanese	220	0.5%
Visible minority, n.i.e.	1,170	2.4%
Multiple visible minorities	975	2.0%
All Others	21,465	44.1%
Total	48,630	100.0%

Toronto	2016	%
Total Visible Minorities	1,385,850	51.5%
South Asian	338,960	12.6%
Chinese	299,465	11.1%
Black	239,855	8.9%
Filipino	152,715	5.7%
Latin American	77,165	2.9%
West Asian	60,320	2.2%
Southeast Asian	41,650	1.5%
Korean	41,640	1.5%
Arab	36,030	1.3%
Japanese	13,410	0.5%
Visible minority, n.i.e.	36,975	1.4%
Multiple visible minorities	47,670	1.8%
All Others	1,305,815	48.5%
Total	2,691,665	100.0%

Note: n.i.e. refers to "not included elsewhere".

Adapted from Statistics Canada, Census 2016, 2011 & 2006.

For definition of variables, refer to Glossary.

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EXHIBIT C

This is ~~not~~ "C" referred to in the
 JAMAAL MYERS
 21
 August 2018
 A COMMISSIONER, ETC.

X



Cheryl Lewis-Thurab
@cheryl_ward45

@Ritallin

Greg!!! Thank you so much for the awesome slam poetry. What a nice surprise at Reza and my campaign launch on Thursday! Wishing you continued success !!

#Cheryl_Ward47 #RezaForWard45
#ScarboroughMoves #ScarbTO #SlamPoetry
#TOPoli #ONPoli

368



Jamaal Myers @JamaalMyers5

Special thanks to #ScarbTO's very own Greg Frankson, Canadian National Poetry Slam Champion who made a surprise appearance at @cheryl_ward45 & @RezaForWard47 launch party. Totally amazing performance!!! @Ritallin #slampoetry #TOPoli ...

6:04 AM - 19 Aug 2018 from Toronto, Ontario

1 Like

1 1



Greg Frankson @Ritallin · 20h

Replying to @cheryl_ward45

Thanks so much Cheryl - it was a pleasure to be there, and best of luck to you and your team as you seek seats on Toronto City Council! Keep in touch!

1 2



Cheryl Lewis-Thurab @cheryl_ward45 · 12h

Thank you! Sure will.

1





Reza Khoshdel
@RezaForWard47

Follow



The Dream Team #Ward47 #Ward45
#ScarboroughMoves #TOpoli #ScarbTO

389



Cheryl Lewis-Thurab @cheryl_ward45

Our awesome Team @stoneape314, @RezaForWard47,
@JamaalMyers5 and K. Asha Maharaj. Thanks for your hard work!
You made the night so special. We had a great turnout and couldn't
have ordered better weather ☀️. Thanks to everyone who...

1:44 PM - 17 Aug 2018

1 Retweet 5 Likes



1

5



Cheryl Lewis-Thurab
@cheryl_ward45

Follow



Our awesome Team @stoneape314,
@RezaForWard47, @JamaalMyers5 and K.
Asha Maharaj. Thanks for your hard work!
You made the night so special. We had a
great turnout and couldn't have ordered
better weather ☀️. Thanks to everyone who
attended to support Reza and me.
#ScarboroughMoves

370



1:38 PM - 17 Aug 2018

5 Likes

1 5



Brian Cheung @stoneape314 · Aug 17



Replying to @cheryl_ward45 @RezaForWard47 @JamaalMyers5

Always a pleasure. Love supporting good people doing good things.
#PlayItForward

1 2





Brian Cheung

@stoneape314

Follow



371

#ScarboroughMoves! @Chefsuman already did (I think). @cheryl_ward45, @RezaForWard47, @alexanderwils16 I'm sure you've got this message sitting in your inboxes--get on it!

#TOpoli

Michael Polanyi @MichaelPolanyi

.@chipadovani and @SarahforMayorTO have committed to fully fund Toronto's poverty reduction strategy, bringing total signatories to 18. Ask your candidates to make the pledge! #prosperityplatform #TOpoli #TOvotes prosperityplatform.ca

12:48 PM - 17 Aug 2018

1 Like



1



1



Reza Khoshdel @RezaForWard47 · Aug 17



Replying to @stoneape314 @Chefsuman and 2 others

Already made my pledge a few days. What a great initiative and to support !



1

2





Reza Khoshdel

@RezaForWard47

Follow



Tonight, we celebrated democracy. We celebrated community. And we celebrated friendships, old and new.

#ScarbTO #TOpoli #ONpoli #Ward47

#ScarboroughMoves #OurCityHall

#TorontoVotes2018



Suman Roy for Ward 39 @Chefsuman

It was great to spend the evening at the campaign launch event of @cheryl_ward45 & @RezaForWard47 with some of the other candidates @BethLevyWard14 & @MegannWillsonTO #TOpoli

8:55 PM - 16 Aug 2018

2 Retweets 8 Likes



↻ 2

8

372



Brian Cheung

@stoneape314

Follow

4 Toronto Councillor candidates at @cheryl_ward45 & @RezaForWard47's launch!

Here Reza and Cheryl are joined by fellow #ScarboroughMoves candidate @Chefsuman and all the way from Etobicoke, @AmandaCoombsTO!

They're repping their wards and their communities. #TOpoli



8:49 PM - 16 Aug 2018

1 Retweet 9 Likes

Reza Khoshdel, Suman Roy for Ward 39 and Amanda Coombs

2 1 9



Brian Cheung @stoneape314 · Aug 17

Whoops, looks like I goofed! @AmandaCoombsTO is actually a candidate for Humber River-Black Creek (toronto.ca/wp-content/upl...), and not in Etobicoke as I'd stated.

I should probably help canvass in the west end at some point to improve my geo knowledge.

1



Reza Khoshdel @RezaForWard47 · Aug 16

Replying to @stoneape314 @cheryl_ward45 and 2 others

@stoneape314 with the paparazzi.com work

374



Brian Cheung
@stoneape314

Follow

Getting ready for the speeches at @cheryl_ward45 and @RezaForWard47 joint campaign launch!

#ScarboroughMoves



5:04 PM - 16 Aug 2018

1 Retweet 4 Likes

1 1 4



Beth Levy @BethLevyWard14 · Aug 17

Replying to @stoneape314 @MegannWillsonTO and 2 others

Couldn't make it across the crowd to say hello! There will be a next time for sure

1 2



Brian Cheung @stoneape314 · Aug 17

For sure. Cheryl and Reza mentioned that you'd come but I was running around a lot. Look forward to meeting you soon and best of luck with your campaign!





Jamaal Myers

@JamaalMyers5

Follow

375

Delegates to the #Scarborough Civic Action Network summit endorsed a PUBLICLY owned & operated 50-stop LRT Network!!! ● = where ppl live & ✨ = priority neighborhoods. Let's get #ScarbTO Moving (together)! 🏠❤️🔧 #ScarboroughMoves #ScarbVotes #TOPoli #KeepTransitPublic #TTC

Let's get Scarborough moving!

50 - STOP LRT NETWORK

Scarborough line Kennedy station 1. Lawrence East 2. Eglinton 3. Midland 4. Scarborough Centre 5. McCowan 6. Centennial Progress 7. Sheppard Ave. East Malvern*	Sheppard East line Don Mills station 27. Consumers 28. Victoria Park 29. Pharmacy 30. Parnell 31. Warden 32. Bay Mills 33. Birchmount 34. Alton Road 35. Kennedy 36. Agincourt GO sta
Eglinton East line Kennedy station 8. Midland 9. Fairmount 10. Danforth Road 11. McCowan 12. Bayview 13. Markham 14. Markham 15. Eglinton Avenue East 16. Scarborough Golf Club 17. Guildwood Parkway 18. Colgate 19. Guildwood 20. Lawrence Avenue East 21. Kingston 22. Wood Hill Collegiate 23. Eglinton 24. U of T Scarborough 25. Midland East 26. Sheppard Avenue East Malvern*	37. Midland 38. Brimley 39. Brownsburg 40. McCowan 41. White Haven 42. Storting 43. Marve 44. Markham 45. Sheppard E. sta 46. Wrentham Way 47. Aurora Hill 48. Neilson 49. Markham Blvd 50. Brentwood Way 51. Homewood

7:48 PM - 15 Aug 2018 from Toronto, Ontario

26 Retweets 33 Likes



4

26

33



Bruce @BruceW Mitchell · Aug 16

Replying to @JamaalMyers5 @normsworld

Oh, I don't know. I trust my mayor that one single, solitary \$3.5B subway stop that people have to bus miles to get to is a much better option

1

1

2



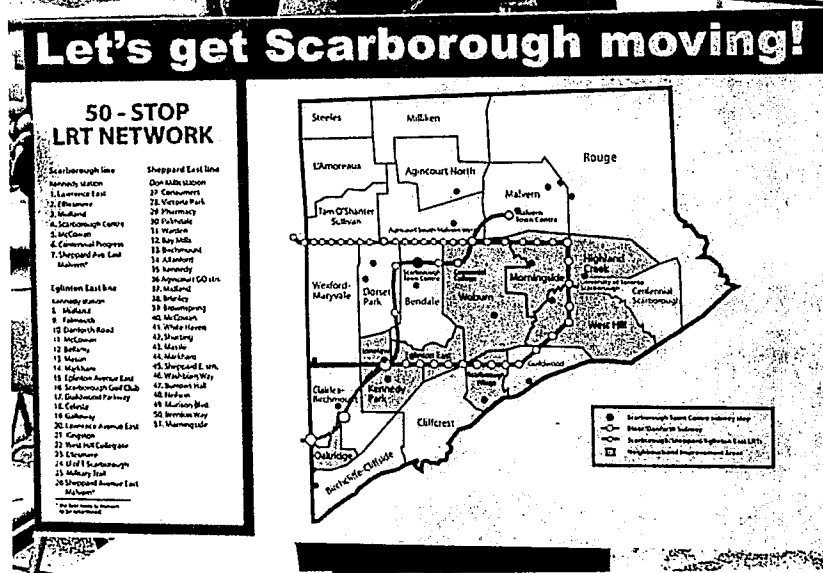
Bruce @BruceW Mitchell · Aug 16

And as a Torontonion, I'm doubly proud that the Scarb one-stop would be the most expensive subway station in the world #Topoli



Jamaal Myers @JamaalMyers5 · Aug 15

Delegates to the #Scarborough Civic Action Network summit endorsed a PUBLICLY owned & operated 50-stop LRT Network!!! 📍 = where ppl live & 🏠 = priority neighborhoods. Let's get #ScarbTO Moving (together)! 🏠❤️👤
#ScarboroughMoves #ScarbVotes #TOPoli #KeepTransitPublic #TTC



4 26 33



Brian Connolly

@bconnolly00

Follow

Replying to @JamaalMyers5 @stoneape314

And PUBLICLY maintained by the TTC!

#onpoli #Toronto #TOpoli #TOcouncil
#Scarborough #ScarbTO #ScarboroughMoves
#TTC #LRT #SmartTrack #Subway
#PrivatizationFailure #KillBill5
#StopAmalgamation2018
#StopTheMegaCityAgain
#ConservativePowerPlay #DontVoteJohnTory
#KeepTransitPublic

9:42 PM - 15 Aug 2018

4 Likes

4



Cheryl Lewis-Thurab
@cheryl_ward45

Follow



377

@MegannWillsonTO @stoneape314 Megann, I'm so happy you will be making a video of your commute to the Rouge. This would give some perspective as to why we need a better, more connected transit system in Scarborough. #TTCRiders #ScarbTO #ScarboroughMoves #SRP #TOPoli #ONPoli

Brian Cheung @stoneape314

This is a brilliant idea! @TransitScarb, you've got some folks attending the @cheryl_ward45 & @RezaForWard47 launch tomorrow too I believe. Make a video or pics of your ride to the venue and I'll make sure it gets thrown up on the screen! twitter.com/MegannWillsonT...

8:12 PM - 15 Aug 2018

1 Retweet 3 Likes



↻ 1

3



Cheryl Lewis-Thurab

@cheryl_ward45

Follow



378

@daibyday The work we've put in will not be in vain! We cannot get back our time or money, but we can continue to fight for our democracy! #WomenWinTO #womeninpolitics #WomenInBusiness #Democracy #TOPoli #ONPoli #ScarbTO #SRP #ScarboroughMoves

dai in revolt @daibyday

My heart breaks for all the candidates who have put in months of work, raised so much money, and taken time away from their lives to step up and work towards a truly representative #Toronto city council #Bill5 #TOPoli

Show this thread

12:54 PM - 15 Aug 2018 from Toronto, Ontario

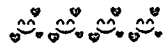
1 Retweet 3 Likes

1 1 3



dai in revolt @daibyday · Aug 15

Replying to @cheryl_ward45





Cheryl Lewis-Thurab

@cheryl_ward45

Follow



I understand that the process is not easy, nor affordable, which is a deterrent. Why not send the cards to all ODSP clients & cut the price in half. Paying \$115 per month for a Presto card is still high for someone on low income. #TOPoli #ScarbTO #Cheryl_Ward45 #ScarboroughMoves

379

TTCriders @ttcriders

With half of new low-income #TTC passes going unused, members of the Fair Fare Coalition say the transit discount is not truly affordable. We need lower fares now! @JohnTory thestar.com/news/gta/2018/...

11:58 AM - 15 Aug 2018 from Toronto, Ontario

2 Likes



2



Suman Roy for Ward 39

@Chefsuman



380



Hey #ScarbTO #SSW , I hope to see you in our community this weekend.
#ScarboroughMoves @DolyBegum @BillBlair @680NEWS @TorontoStar @SCMirror @CrossroadsBIA



11:13 AM - 15 Aug 2018

5 Likes



5



Brian Cheung

@stoneape314

Follow



381

#ScarboroughMoves @cheryl_ward45
@RezaForWard47 @Chefsuman
@alexanderwils16 @chipadovani
@TiffanyFordTO

A rallying call for the 'burbs

Brittany Andrew-Amofah @BrittanyAmofah

Been doing some light research:

The only path to victory (12 council seats + mayor) I see for progressives in the Toronto municipal election is organizing and winning in the suburbs

Show this thread

8:53 AM - 15 Aug 2018

2 Retweets 7 Likes



1 2 7



Brian Cheung @stoneape314 · Aug 15



Apologies to other progressive candidates in Scarborough and Etobicoke for overlooking and not tagging you--I can only plead ignorance. Add yourselves to the tweet chain!

2





Jamaal Myers
@JamaalMyers5

Follow



Change is coming to #ScarbTO!!!
#ScarboroughMoves #OurCityHall
#TorontoVotes2018 #ScarboroughVotes

382



Suman Roy for Ward 39 @Chefsuman

Today I am more determined than I have ever been. Determined to stand up for #Democracy, determined to take on those, who supported this undemocratic venture by our province.. I will be in the game, ready to take on both the incumbents @SCMirror ...

7:17 PM - 14 Aug 2018

1 Retweet 3 Likes



1

3



ConnectScarborough @ConnectScarbTO · Aug 11

Apparently DOWNTOWN councillor @m_layton knows what's best for Scarborough... maybe Scarborough councillors should start dictating policy in his ward...

Mike Layton @m_layton

Ford blames @JohnTory for delays in Transit expansion? That's rich. FORD ordered staff to stop expansion. Scarb LRT would be built (or almost completed construction by now), so would Waterfront West LRT for Etobicoke. #bs twitter.com/m_layton/statu...

9 1 3



Jamaal Myers @JamaalMyers5 · Aug 11

FACT: #ScarbTO residents WANT a 50-stop LRT network vs 1 subway stop. 125k+ ppl could walk to a stop. 86K cars off the road. 7 priority neighborhoods & 3 campuses connected. 16 mins b/w Malvern & Kennedy. What's not to like???

2 1 7



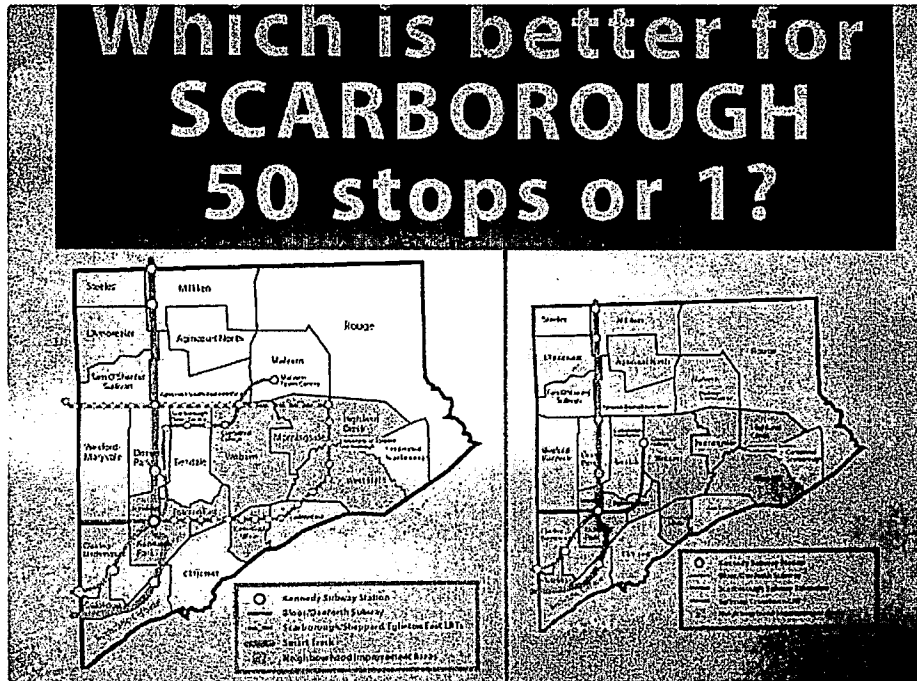
Jamaal Myers

@JamaalMyers5

Follow

Replying to @JamaalMyers5 @ConnectScarbTO @m_layton

FACT: a 50-stop LRT network connects ALL of #ScarbTO. How does a 1-stop subway do the same? 🗣️👤 #TOPoli #ScarboroughMoves #ScarboroughVotes2018



10:54 PM - 11 Aug 2018

383

1 5



ConnectScarborough @ConnectScarbTO · Aug 11
Apparently DOWNTOWN councillor @m_layton knows what's best for Scarborough... maybe Scarborough councillors should start dictating policy in his ward...

Ford blames @JohnTory for delays in Transit expansion? That's rich. FORD ordered staff to stop expansion. Scarb LRT would be built (or almost completed construction by now), so would Waterfront West LRT for Etobicoke. #bs twitter.com/m_layton/statu...

9 1 3



Jamaal Myers @JamaalMyers5 · Aug 11
FACT: #ScarbTO residents WANT a 50-stop LRT network vs 1 subway stop. 125k+ ppl could walk to a stop. 86K cars off the road. 7 priority neighborhoods & 3 campuses connected. 16 mins b/w Malvern & Kennedy. What's not to like???

2 1 7

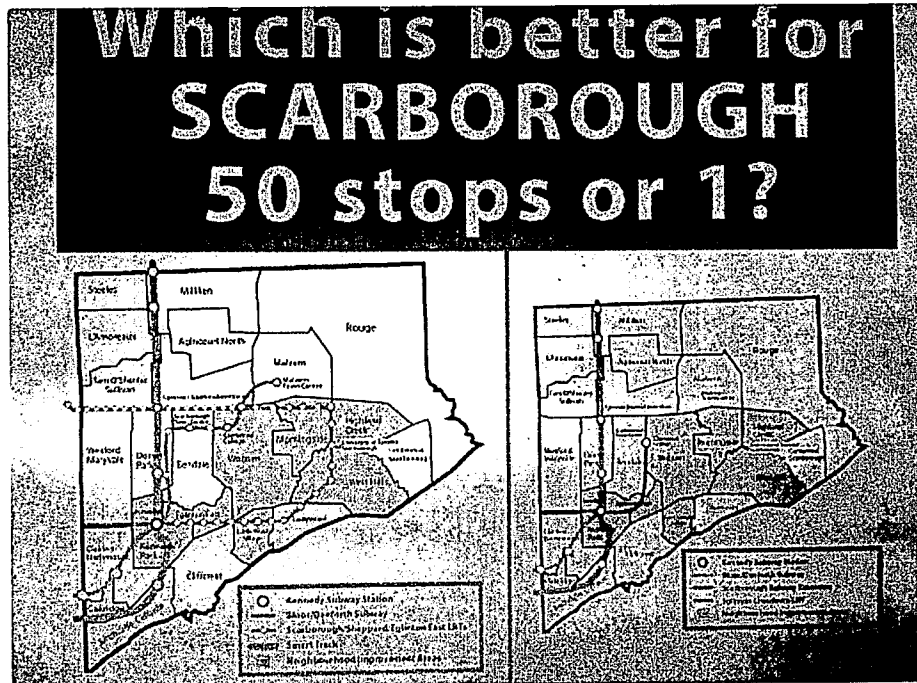


Jamaal Myers
@JamaalMyers5

Follow

Replying to @JamaalMyers5 @ConnectScarbTO @m_layton

FACT: a 50-stop LRT network connects ALL of #ScarbTO. How does a 1-stop subway do the same? #TOPoli #ScarbTOVotes2018



10:54 PM - 11 Aug 2018

eryl_ward45,
message sitting in

384

ully fund
es to 18. Ask
Opoli #TOvotes

And we celebrated
DurCityHall

mpaign launch
d47 with some
&

orWard47's launch!

es candidate
bsTO!



ForWard47 joint



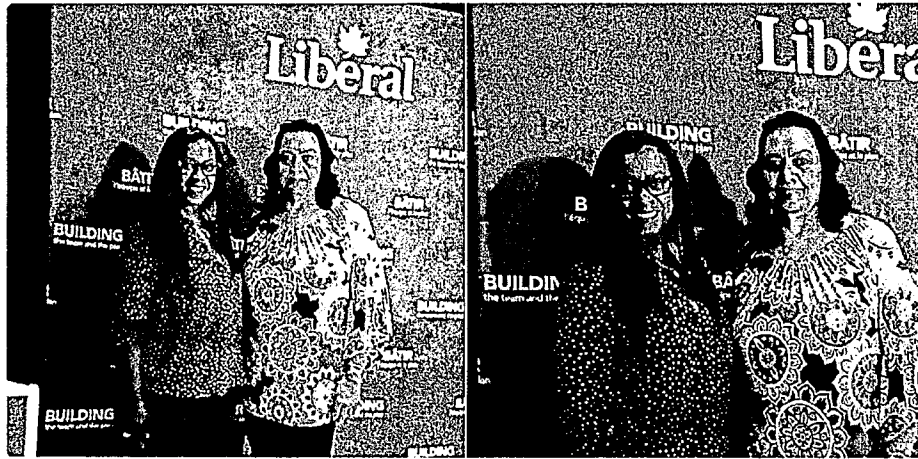
Cheryl Lewis-Thurab

@cheryl_ward45

Follow

385

Enjoyed the evening with my dear friend and colleague, K. Asha Maharaj at @SalmaZahid15 campaign launch today 🇨🇦
#WomenInPolitics #WomenInLeadership
#DiversityIsOurStrength
#RepresentationMatters #topoli #onpoli
#cdnpoli #ScarbTO #ScarboroughMoves



7:30 PM - 11 Aug 2018 from Toronto, Ontario

1 Retweet 1 Like



1

1



Cheryl Lewis-Thurab
@cheryl_ward45

Follow



Great to reconnect with @rubylatif during her training session at Operation Black Vote today! @blackvotecanada #GetOutTheVotes #Cheryl_Ward45 #BBPA #WomenInPolitics #WomenInLeadership #TOPoli #ONPoli #ScarbTO #SRP #ScarboroughMoves

386



4:25 PM - 11 Aug 2018 from Toronto, Ontario

2 Retweets 7 Likes

3 2 7



Ruby Latif @rubylatif · Aug 13



Replying to @cheryl_ward45 @blackvotecanada

Same! Nice to reconnect and congrats on putting your name forward, you will do great <3

1 1



Cheryl Lewis-Thurab @cheryl_ward45 · Aug 13



Thank you Ruby! Keep up the great job you are doing as well!



Megann Willson @MegannWillsonTO · Aug 11



Replying to @cheryl_ward45 @rubylatif @blackvotecanada

She is awesome! Learned so much from her @WomenWinTO .



Suman Roy for Ward 39
@Chefsuman

Follow



387

Thanks @cheryl_ward45 and @RezaForWard47 for coming to our #campaign launch #ScarboroughMoves #topoli



3:25 PM - 11 Aug 2018

6 Likes



6



Cheryl Lewis-Thurab

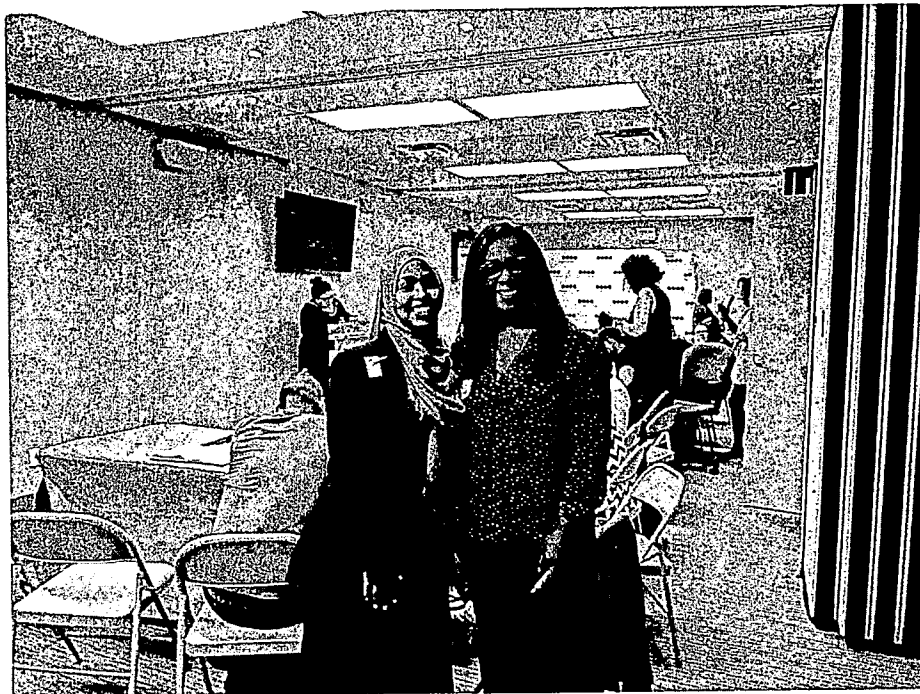
@cheryl_ward45

Follow



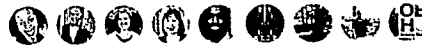
388

Great to see my @WomenWinTO colleague @samiya_ph at Operation Black Vote training this morning. @blackvotecanada @DemocracyKit #Cheryl_Ward45 #topoli #ONpoli #WomeninPolitics #WomenInLeadership #ScarbTO #ScarboroughMoves



9:09 AM - 11 Aug 2018 from Toronto, Ontario

4 Retweets 19 Likes



1 4 19



Kristyn Wong-Tam @kristynwongtam · Aug 11



Replying to @cheryl_ward45 @WomenWinTO and 3 others

Look at this dynamic duo. Picture perfect! #addwomenchange politics

1 1 5



Samiya.Abdi @samiya_ph · Aug 11



Thank you for your support and mentorship. Hands down #womenchange politics

1 1 4





Brian Connolly
@bconnolly00

Follow



389

#onpoli #Toronto #TOpoli #TOCouncil
#Scarborough #ScarbTO #ScarboroughMoves
#TTC #Subway #P3 #Privatization #Presto
#UPX #PrivatizationFailure #KillBill5
#StopAmalgamation2018
#StopTheMegaCityAgain
#ConservativePowerPlay #KeepTransitPublic

Michael Bednarski @mikebednarski
Replying to @Spacing @PlannerSean

Doug Ford will want to take control of the TTC subway system so that it can be used to subsidize private operators in the suburbs. #topoli #ttc

6:30 AM - 20 Aug 2018



390



Michelle Holland @hollandmichelle · Aug 13

Cllr De Baeremaeker has been a tireless advocate for Scarborough transit expansion, environmental protection and animal rights ~ I call him a true friend and someone who truly inspires! #TOpoli



Scarborough Mirror @SCMirror

Veteran Scarborough councillor Glenn De Baeremaeker calls it quits because of Doug Ford's plan to cut Toronto council. toronto.com/news-story/881... #TOpoli #ScarbTO #TOcouncil



1



3



Suman Roy for Ward 39

@Chefsuman

Follow

Replying to @hollandmichelle

Tireless advocate for #Scarborough Transit, admits his mistake in supporting one stop subway @SCMirror : [google.ca/amp/s/www.thes ...](http://google.ca/amp/s/www.thes...) #ScarboroughMoves

Councillor Glenn De Baeremaeker pulls out of race, calls it a 'long shot' to ge...

De Baeremaeker acknowledges that new ward boundaries dramatically reduce the chances of him pulling off a win this fall.

thestar.com

7:44 AM - 17 Aug 2018 from Toronto, Ontario

1 Like



1



Suman Roy for Ward 39
@Chefsuman

Follow



This is great news. But it is sad that #ScarbTO is not getting any of these stations.
#ScarboroughMoves @SCMirror

391



Cycle Toronto @CycleToronto

We're happy to hear @BikeShareTO will install another 75 stations by the end of the month, bringing the total to 360 stations & 3,750 bikes! BikeShare is an important part of making Toronto a better cycling city & we support continued expansion ...

11:45 AM - 16 Aug 2018 from Toronto, Ontario

1 Like



1



Suman Roy for Ward 39
@Chefsuman

Follow



392

Shame on our #Blue elected representatives.
As #Canadians we used to cherish
#Democracy. This vote defied our
#CanadianValues. Sad day.
#ScarboroughMoves #Topoli #Onpoli



Colin D'Mello CTVNews @ColinDMello

Boos and shouts of "shame" from the opposition as the government votes to slash the size of city council. #ONpoli

1:06 PM - 14 Aug 2018 from Toronto, Ontario

1 Like



1

- 3
25
32

Steve Fleck @stevefleck · Aug 13

I REALLY feel sorry for the people of Scarborough with the likes & actions of #RobFord, @FordNation @johntory De Baermaeker and others, 8+ years on, they have NOTHING in the way of transit developments. Some of those LRT lines would be running TODAY!! #ToPoli

1
6

▼
- Reza Khoshdel** @RezaForWard47 · Aug 13

We feel the pain of these poor decisions everyday.

1

▼
- Steve Fleck** @stevefleck · Aug 13

Better Public Transit can be game changing life changing for many! But in Scarborough because of political posturing blundering, NOTHING has been done for a long time! Sad!

1

▼
- Reza Khoshdel** @RezaForWard47 · Aug 13

You are absolutely correct! It is disheartening, to say the least. Luckily there are candidates out there such as myself, @cheryl_ward45, @alexanderwils16, & @Chefsuman who are fighting to bring real change to #Scarborough

No more business as usual. #TOpoli #TOvotes18 #ScarbTO

2
3

▼
- Steve Fleck** @stevefleck · Aug 13

One small example in another area of the GTA. We recently have had ALL-DAY @GOtransit Train Service in Aurora - this has been a HUGE Game-Changer for many!

1
1

▼
- Cheryl Lewis-Thurab**
@cheryl_ward45

Follow

▼

Replying to @stevefleck @RezaForWard47 and 6 others

We cannot underestimate the importance of good transit. Whether or not we drive, many of us still rely on public transit. It's embarrassing that in a world class city such as ours, we are so behind on something as important as public transit. #ScarbTO #ScarboroughMoves #TOpoli

10:50 PM - 13 Aug 2018 from Toronto, Ontario

2 Retweets 2 Likes

2 2

393



Reza Khoshdel

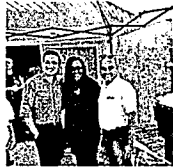
@RezaForWard47

Follow



394

Had a fantastic time today w/
@cheryl_ward45 at the campaign launch of
our dear friend and fellow
#ScarboroughMoves member, @Chefsuman. I
couldn't be prouder to stand beside such
great people as we strive to bring positive
change to #ScarbTO #ONpoli #TOpoli
#TOvotes



Suman Roy for Ward 39 @Chefsuman

Thanks @cheryl_ward45 and @RezaForWard47 for coming to our
#campaign launch #ScarboroughMoves #topoli

6:01 PM - 11 Aug 2018

1 Retweet 5 Likes



1

5



Cheryl Lewis-Thurab

@cheryl_ward45

Follow



395

Hey @SarahforMayorTO Sorry I missed you at Suman Roy's campaign launch today!
#ScarboroughMoves #ScarbTO #topoli
#onpoli #Leadership #WomenInLeadership
#WomenInPolitics



Suman Roy for Ward 39 @Chefsuman

Big thanks to @SarahforMayorTO for coming and supporting my campaign. @jen_keesmaat : you were missed at the campaign launch. Looking forward to working with amazing mayoral candidates this election #royofhope #TOPoli #Elections2018

4:43 PM - 11 Aug 2018 from Toronto, Ontario

2 Likes



2



Cheryl Lewis-Thurab
@cheryl_ward45

Follow

396

It was my absolute pleasure @Chefsuman!
Congratulations once again! Always great to
be in company of you and @RezaForWard47.
The journey to City Hall continues! Let's keep
up the good fight 🇪🇺
#Cheryl_Ward45 #ScarbTO
#ScarboroughMoves #TOpoli #ONPoli
#Leadership #Perseverance



Suman Roy for Ward 39 @Chefsuman
Thanks @cheryl_ward45 and @RezaForWard47 for coming to our
#campaign launch #ScarboroughMoves #topoli

4:32 PM - 11 Aug 2018 from Toronto, Ontario

1 Retweet 4 Likes

1 4

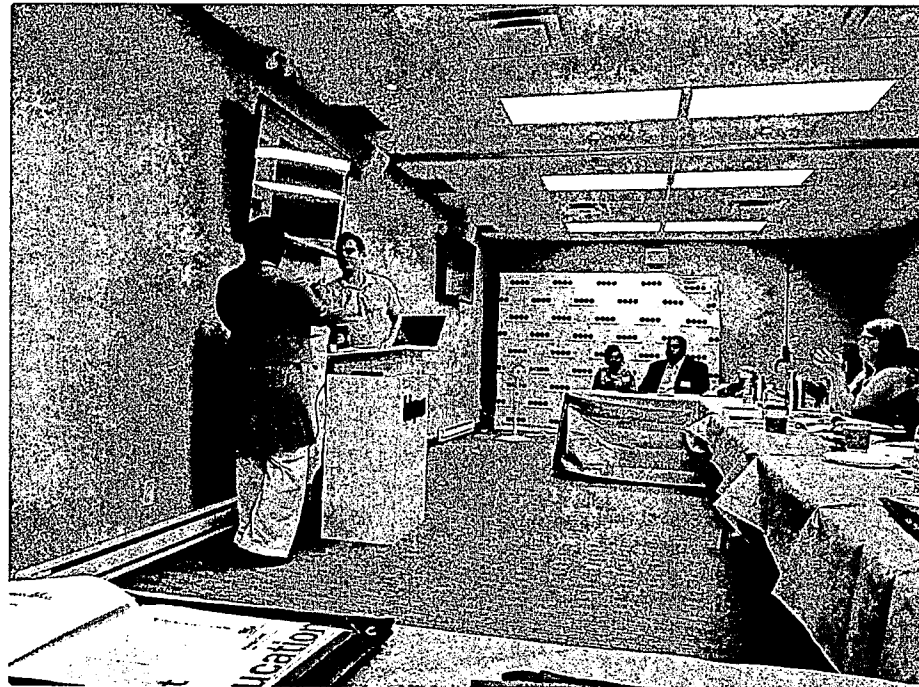


Cheryl Lewis-Thurab
@cheryl_ward45

Follow

397

Excellent training this morning by Chris Cowperthwaite @cswc @DemocracyKit @blackvotecanada @samiya_ph @JamaalMyers5 @Ward44Felicia #Cheryl_Ward45 #TOPoli #ONpoli #ScarboroughMoves #ScarbTO



8:57 AM - 11 Aug 2018 from Toronto, Ontario

5 Retweets 16 Likes



5

16



Reza Khoshdel

@RezaForWard47

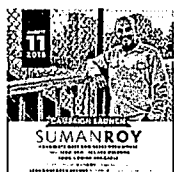
Follow



Come out and support @Chefsuman today for his campaign launch! Suman is the right person to bring people together and get things done for #Ward39

#ScarboroughMoves #ONpoli #TOpoli

#ScarbTO



Suman Roy for Ward 39 @Chefsuman

I am so excited to see you today as we officially launch our campaign.

Looking forward to seeing you all #ScarbTO #ScarboroughMoves #TorontoVotes #topoli

8:01 AM - 11 Aug 2018

1 Retweet 1 Like



Retweet 1

Like 1



Suman Roy for Ward 39
@Chefsuman

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399

I am so excited to see you today as we officially launch our campaign. Looking forward to seeing you all #ScarbTO #ScarboroughMoves #TorontoVotes #topoli

AUGUST 11 2018

CAMPAIGN LAUNCH

SUMANROY

CANDIDATE MEET AND GREET OPEN HOUSE
 TIME: 12PM-3PM | ALL ARE WELCOME
 FOOD & DRINK AVAILABLE

LOCATION | SUMANROY CAMPAIGN OFFICE
 3304 DANFORTH AVENUE SCARBOROUGH, ON M1L 1C4

4:29 AM - 11 Aug 2018 from Toronto, Ontario

1 Retweet 1 Like

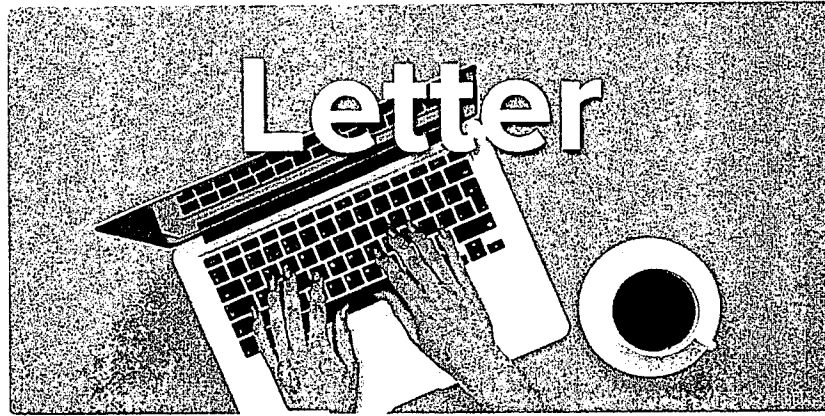
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400



Scarborough Mirror @SCMirror · Aug 9

LETTER: Ontario's meddling in Toronto election undemocratic, Scarborough reader says. [toronto.com/opinion-story/...](http://toronto.com/opinion-story/) #TOPoli #ONpoli #ScarbTO



1 1 7



Brian Cheung
@stoneape314

Follow

Replying to @SCMirror

Good on you Rosemary! As Scarborough candidates and residents, this is also what #ScarboroughMoves has been saying.
@cheryl_ward45 @RezaForWard47
@Chefsuman @alexanderwils16

6:35 PM - 9 Aug 2018

1 Retweet 2 Likes

1 1 2



Nick Kossovan @NKossovan · Aug 12

Replying to @stoneape314 @SCMirror and 4 others

#Toronto council is a bloated, and costly, bureaucracy populated by career politicians (2 term limit needed). No brainer to cut council in half. !! Won't affect how Toronto is run and citizens will still be heard as much as they are today.

#TOPoli #Ward38 #ScarbTo #onpoli

1 1





Brian Connolly

@bconnolly00

Follow



#onpoli #Toronto #TOpoli #TOCouncil
#Scarborough #ScarbTO #ScarboroughMoves
#TTC #Subway #P3 #Privatization #Presto
#UPX #PrivatizationFailure #KillBill5
#StopAmalgamation2018
#StopTheMegaCityAgain
#ConservativePowerPlay #KeepTransitPublic

Spacing @Spacing

Ford's pledge to upload the subway system will become the Brexit of Toronto politics: a promise balanced on the most dubious of mandates, barely scrutinized during the election and certain to deliver administrative chaos for years to come.

6:30 AM - 20 Aug 2018



401

402



Brian Connolly

@bconnolly00

Follow

#onpoli #Toronto #TOpoli #TOCouncil
 #Scarborough #ScarbTO #ScarboroughMoves
 #TTC #LRT #SmartTrack #Subway
 #PrivatizationFailure #KillBill5
 #StopAmalgamation2018
 #StopTheMegaCityAgain
 #ConservativePowerPlay #KeepTransitPublic

Tory Vote %	Replacement
76.32%	Jim Hart
42.03%	Lucy Traisi
44.09%	Jonathan Ts
80.39%	Miqanoush
64.71%	Michael For
80.00%	Neethan Sh

Matt Elliott @GraphicMatt

Significant City Council Scorecard finding: council appointed four replacement councillors this term. In every case, the replacement councillor was more likely to vote with Mayor John Tory on major items.

Show this thread

10:25 AM - 18 Aug 2018

2 Retweets



↻ 2



Brian Connolly
@bconnolly00

Follow



403

#onpoli #Toronto #TOpoli #TOCouncil
#Scarborough #ScarbTO #ScarboroughMoves
#TTC #LRT #SmartTrack #Subway
#PrivatizationFailure #KillBill5
#StopAmalgamation2018
#StopTheMegaCityAgain
#ConservativePowerPlay #KeepTransitPublic

TTCriders @ttriders

"Countless transit systems around the world have seen the catastrophic effects of privatization - cuts to service, increased fares and the safety of the public."

@atu_canada responds to Premier Ford's announcement that the province will upload the #TTC newswire.ca/news-releases/...

6:18 PM - 17 Aug 2018

2 Likes



2



Brian Connolly

@bconnolly00

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404

#onpoli #Toronto #TOpoli #TOCouncil
 #Scarborough #ScarboroughMoves #ScarbTO
 #TTC #Subway #LRT #SmartTrack
 #PrivatizationFailure #KillBill5
 #StopAmalgamation2018
 #StopTheMegaCityAgain
 #ConservativePowerPlay #DontVoteJohnTory
 #KeepTransitPublic



Jamaal Myers @JamaalMyers5

Delegates to the #Scarborough Civic Action Network summit endorsed a PUBLICLY owned & operated 50-stop LRT Network!!!
 🏠 = where ppl live & 🌟 = priority neighborhoods. Let's get #ScarbTO Moving (together)! 🏠❤️🌟 #ScarboroughMoves ...

9:39 PM - 15 Aug 2018

1 Like

1

EXHIBIT D

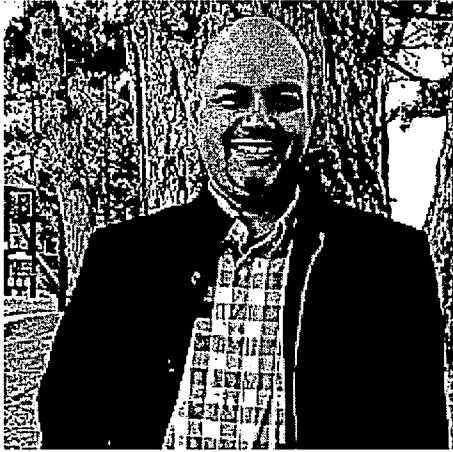
This is Exhibit "D" referred to in the
affidavit of Jancia Myers
sworn before me, this 21
day of August 2018.

Scarborough Moves! Platform
A COMMISSIONER, ETC.

405

1. Build an affordable and accessible **public transit network** in Scarborough.
2. Work with local businesses to foster **local economic development** in Scarborough.
3. Increase funding for **recreational programs** for youth.
4. Develop a **seniors and disability engagement strategy**.
5. Encourage **cultural development** initiatives throughout Scarborough.
6. Advocate for an **affordable housing** strategy.
7. Create a city-wide plan to **fight hunger**.
8. **Expand childcare** options for Scarborough families.
9. Improve **community and road safety**.

Scarborough Moves! is a grassroots movement of people working together to bring positive changes to our communities. We're fielding a slate of candidates who are committed to bringing real change to Scarborough.



Suman Roy immigrated to Canada 18 years ago with \$48 in his pocket. He understands first-hand what it takes for a marginalized persons to establish themselves in Canada and the barriers they face. Today he's an executive chef at the University of Toronto and a renowned member of Toronto's culinary community with a passion for combatting food insecurity. In his work and his community activism he's dedicated himself to combatting hunger in Toronto and understands how food insecurity is tied to housing, transit and poverty. Fighting hunger is one of the reasons Suman decided to run for City Council.

Prior to entering politics Suman was a member of the Toronto Board of Health, where he advocated for student nutrition programs and safe injection sites. He was also a member of Toronto Food Policy Council and was a key architect of Toronto Food Strategy. Currently, he chairs the board of directors of Food Share Toronto, Canada's largest food security organization. As a tireless community advocate in Scarborough he has championed the creation of farmers markets, community gardens and public green spaces in Scarborough.

Suman is running as part of slate of progressive candidates across Scarborough known as Scarborough *Moves!* which are committed to building an affordable, safe and sustainable community for all residents. He lives in Southwest Scarborough with his wife and three year old daughter.

Ward: 20 (39) – Scarborough Southwest
Twitter: @ChefSuman
Website: <https://www.sumanroy.com/>



Alex Wilson has been a pastor at St. Stephen's Presbyterian Church for over 13 years where he's been a committed advocate for addressing poverty in his community. As leader of his congregation he partnered with the Daily Bread Food Bank and Second Harvest to expand his church's food bank so that it now offers a weekly soup kitchen to meet the needs of his community. Putting the voices of Scarborough on the agenda at City Hall motivated him to run for City Council.

Alex is a committed advocate for affordable housing in Scarborough. As a member of the Interfaith Social Assistance Reform Coalition and the Muslim Christian Liaison Committee, he fought for the right to be housed with dignity. Recently his congregation submitted an application to the City of Toronto through the "Doors Open Program" to build a 100 unit affordable housing project with room to continue providing vital outreach programs currently provided by his ministry. His involvement in the community extends to the health sector where he chairs the Scarborough Rouge Hospital Community Advisory Council.

As a member of the Scarborough Business Association and Scarborough Community Renewal Organization, Alex is a strong proponent for creating opportunities for residents. He partnered his church with the Toronto City Mission to offer after school programs and summer camps for young people.

Alex is running as part of slate of progressive candidates across Scarborough known as Scarborough *Moves!* which are committed to building an affordable, safe and sustainable community for all residents. He lives in Scarborough Center with his wife and two young sons.

Ward: 21 (40) – Scarborough Center
Twitter: @alexanderwils16
Website: <https://www.alexwilson.org/>



Cheryl Lewis-Thurab is a community advocate and an alumna of the Women Win TO program.

In 2017, she ran to be appointed as interim Toronto City Councillor in Ward 44, Scarborough-Rouge. Cheryl has over 20 years' experience in the non-profit sector, with a background in Fundraising and Events Management. She is a former staff member of United Way Toronto and the Canadian Breast Cancer Foundation. She served as Union Representative and Workplace Policy Advisor/Mediator at United Way and founded the highly successful Paint Your School Pink program with CBCF, which encourages youth to take on leadership roles.

Cheryl is an engaging speaker and facilitator who is passionate about women and youth empowerment, equity, diversity, accessibility and inclusion. Her value for family and community stems from her upbringing in the Caribbean, where from a very young age; the importance of caring for others was instilled in her. Starting her new life in Canada with two young children came with many challenges, including the death of her mother shortly after her arrival and having to take on the role of joint-caregiver for a sibling with a disability.

She is a past Board Member of Touchstone Youth Shelter and served on various other committees, including SwizzleStick Theatre and Toronto Caribbean Carnival (Caribana). As a Tenant Representative with Toronto Community Housing, she advocated on behalf of tenants and initiated the TCHC Youth Accessing Resources Project.

Cheryl is a resident of Scarborough. She is running as part of a slate of progressive candidates across Scarborough known as Scarborough Moves!, who are committed to building affordable, safe and sustainable communities for all residents.

Ward: 25 (45) – Scarborough-Rouge Park
 Twitter: @cheryl_ward45
 Website: cheryllewisthurab.ca



Reza Khoshdel's family immigrated to Canada when he was five years old. Like many immigrants, his family struggled to get on their feet and they relied on community support and government assistance to settle. His early experiences with poverty and the power for government to reduce poverty shaped him early on. It also instilled in him the value of education. He is an MPA/MBA graduate and previously served as a legislative advisor and community organizer to the Minister of Research and Innovation at Queen's Park.

As a community organizer, he helped community members with complicated problems that were brought to his attention when no other viable solutions were available. His role as a Legislative Assistant and MPP Liaison to the Minister of Research and Innovation allowed him to work on fostering scientific discovery and commercialization of new technologies and products with private and public sector partners.

Upon leaving public service, Reza moved to the private sector and currently serve as an operations executive for an education firm that specializes in mathematics education for high performing and gifted students.

Reza is running as part of slate of progressive candidates across Scarborough known as Scarborough *Moves!* which are committed to building an affordable, safe and sustainable community for all residents. He lives in Scarborough-West Hill with his wife and two year old son.

Ward: 25 (47) – Scarborough-Rouge Park¹
 Twitter: @RezaForWard47
 Website: RezaForWard47.com

¹ Due to Bill 5, Reza and Cheryl are now running in the same ward. Until the matter has been settled in court they will each continue to run their campaigns.

EXHIBIT E



This is Exhibit ^{"E"} referred to in the
 affidavit of JAMAL MEYERS
 sworn before me, this 21
 day of AUGUST 2018

[Signature]

 A COMMISSIONER, ETC.

TAB 14

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N :

**CHRIS MOISE and ISH ADERONMU and PRABHA KHOSLA on her own behalf and
on behalf of all members of Women Win TO**

Applicants

- and -

**ATTORNEY GENERAL OF ONTARIO and THE CORPORATION OF THE CITY
OF TORONTO**

Respondents

APPLICATION under Rule 14.05(3)(g.1) of the *Rules of Civil Procedure*, RRO 1990, Reg 194

**AFFIDAVIT OF CHERYL LEWIS-THURAB
(Sworn August 21, 2018)**

I, Cheryl Lewis-Thurab, of the City of Toronto, MAKE OATH AND SAY:

1. I am a resident of the City of Toronto. I am also a candidate in the 2018 Municipal Election and a participant in Women Win TO. For these reasons, I have direct knowledge of the matters to which I depose in this affidavit. Where the information in this affidavit is not based on my direct knowledge, but is based upon information and belief from other sources, I have stated the source of that information and I believe the information to be true.

Background

2. I currently live in the Rouge area of Scarborough in what is now Ward 45 (under the 47 ward structure). I have lived in this area for over 10 years. I regularly voted in past

municipal elections, and it is also my intention to vote on October 22, 2018 in the City's municipal election.

3. I am a woman of colour and a mother of two grown daughters. For over 20 years, I have worked in the non-profit sector. I worked as a Fundraising Manager with United Way Toronto and as an advocate for women's health and empowerment.

My Decision to Run for City Council

4. I first ran for interim City Councillor following the death of Councillor Ron Moeser in April 2017. Councillor Moeser was the councillor for Ward 44, part of which became Ward 47 after the City of Toronto's Ward Boundary Review. Part of Ward 44 also became Ward 45 after the Ward Boundary Review. Since interim City Councillors are appointed, all candidates gave a presentation at City Council in June 2017. After that process Jim Hart was appointed as the interim City Councillor.

5. However, following my presentation, Councillor Kristyn Wong-Tam approached me and asked me to join Women Win TO ("WWTO"). I agreed to join WWTO for reasons discussed further below.

My Participation in WWTO

6. WWTO is a program which trains women, including racialized and Indigenous women, trans, and gender non-conforming persons, to run for municipal office and increase their representation on City Council. I applied to the program shortly after my presentation to City Council, and began training when the program commenced in September 2017.

7. As a participant in WWTO, I really got to understand what it meant to run for City Council in an election. WWTO provided us with workshops and presentations to help us run successful campaigns.

8. Without such training, I would not have been privy to the ins and outs of running a successful campaign, as I do not have a political background or access to the resources that incumbent campaigns benefit from. In addition to the practical, skills building workshops and presentations WWTO provides, I was able to learn from the experiences of other women who ran for municipal, provincial and federal seats. I was also introduced to Democracy Kit, an organization that provides resources and training for running municipal campaigns, and taught how to access their training kits effectively. Without access to the WWTO programming, training and resources, and the much needed boost it provided, I may not have run for City Council in the 2018 municipal election.

9. When it came time to decide what ward I would run in, I chose my home ward: Ward 45 – Scarborough-Rouge River. At that time I was aware that I would be running against an incumbent in Ward 45, however after participating in WWTO and becoming a part of a such an engaging, thoughtful, and driven community, I knew I had the tools and wherewithal needed to challenge an incumbent.

10. I saw the 2018 election as an opportunity to represent the residents of my community in Scarborough and bring a stronger voice to City Council. I would not have gotten the tools for running a successful campaign without the training, guidance, and expertise that WWTO provided me.

11. The candidates that come from WWTO reflect the diversity of the City. In WWTO there was a strong presence of racialized women including: Black women, Indigenous women, and women of colour. Minority voices were given an opportunity through this organization to properly represent their communities.

City Council's Is Not Representative of the City's Diversity

12. 51.5% of the City's residents are visible minorities, but I am aware that at present, at least 80% of City Council is white. City Council, to my knowledge, discusses and makes important decisions on issues relevant to diversity, equity, and multiculturalism even though the diversity of the City is not reflected in the make-up of City Council.

13. Currently, there is only one racialized woman on City Council, Councillor Kristyn Wong-Tam. This lack of representation of women of colour speaks to the need of organizations like WWTO to empower diverse women to run for office. It is important that communities see themselves reflected in their municipal officials, which is not the case at the moment.

14. I recently spoke at a youth organization in Scarborough as part of my campaign activities. Most of the youth who attended were Black. A few told me afterwards that they felt empowered and encouraged by seeing someone from their community running for office. I am passionate about women and youth empowerment and I strongly believe that I can set an example for women and youth in my community; in particular, I believe I can be a role model for racialized individuals by running for City Council.

15. For me it is important to be a part of the current transformation that WWTO is helping drive, and to challenge the lack of diversity at City Council. In addition to wanting to represent the needs of my community, another reason I chose to run for City Council was so that youth in my community could see themselves reflected in a City Councillor, and not think to themselves that aspiring to public office is an unrealistic dream. I am hopeful that the struggles and disadvantages that are faced by diverse candidates are not carried into the next generation of racialized candidates running for City Council.

The Impact of Changing the Boundaries During the Election Campaign on My Campaign

16. Under the 47 Ward structure, I was running against 4 other candidates, including an incumbent. However, under the proposed 25 Ward structure, I will be running against 13 other candidates which will present an uphill battle due to incumbent enjoying name recognition, as well as having more money at their disposal.

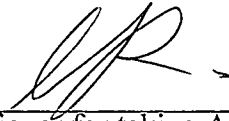
17. Not only has the number of candidates increased, but the new ward size will have a major impact on my campaign. I was prepared to run in a ward with a certain number of voters when the election cycle began. But now, with the much larger number of voters under the 25 ward model, I am forced to recalibrate and strategize how to cover the additional ground I need for my campaign. In my view, for incumbents, this would not be as great a hurdle, because they have more wide-spread name recognition, which is a very powerful tool in municipal elections.

18. There will also be a large financial impact on my campaign, as I will need to reprint additional campaign materials to cover a ward of this magnitude, doubling the amount of

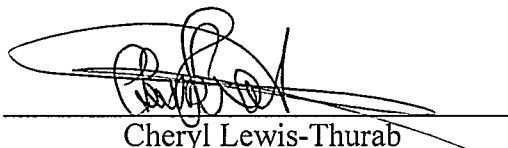
literature I had budgeted for. This will present a large financial burden for my campaign, which already had limited resources and is not well positioned to absorb these obligations.

19. I swear this affidavit in support of the Applicants' application and for no other or improper purpose.

SWORN AFFIRMED BEFORE ME at the City of Toronto, Ontario this 21st day of August, 2018.



A Commissioner for taking Affidavits (*or as may be*)

} 

Cheryl Lewis-Thurab

CHRIS MOISE, et al. v. ATTORNEY GENERAL OF ONTARIO, et al.

Court File No.: CV-18-00603633-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at Toronto

APPLICATION RECORD – VOLUME II OF II

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