

FEDERAL COURT

B E T W E E N:

CANADIAN FRONTLINE NURSES AND KRISTEN NAGLE

Applicants

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF REBECCA COLEMAN

FEDERAL COURT

B E T W E E N:

CANADIAN CIVIL LIBERTIES ASSOCIATION

Applicant

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF REBECCA COLEMAN

FEDERAL COURT

B E T W E E N:

CANADIAN CONSTITUTION FOUNDATION

Applicant

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF REBECCA COLEMAN

FEDERAL COURT

B E T W E E N:

**JEREMIAH JOST, EDWARD CORNELL, VINCENT GIRCYS, and HAROLD
RISTAU**

Applicants

and

**GOVERNOR IN COUNCIL, HER MAJESTY IN RIGHT OF CANADA,
ATTORNEY GENERAL OF CANADA, and MINISTER OF PUBLIC SAFETY AND
EMERGENCY PREPAREDNESS**

Respondents

AFFIDAVIT OF REBECCA COLEMAN

AFFIDAVIT OF REBECCA COLEMAN

I, REBECCA COLEMAN, of the City of Oshawa, in the Regional Municipality of Durham, in the province of Ontario, SWEAR THAT:

1. I am the paralegal with the Department of Justice assigned to this matter. As such, I have knowledge of the matters hereinafter deposed to, except where stated to be based on information and belief. As to those matters, I verily believe them to be true.

2. As part of my work as a paralegal, I have reviewed a number of media articles, official releases and statements, and Court materials relating to “Freedom Convoy 2022”. Official releases and statements and a selection of media articles from a broad spectrum of news sources are provided below in chronological order to assist with background context in these proceedings. This scan is not intended to be exhaustive or representative of the entire collection of media and statements available, but to lay out a chronology of developments reported in the news media and statements made by public officials and various implicated organizations. Court documents from other “Freedom Convoy” court proceedings are provided at the end of my affidavit.

3. On November 19, 2021, the Public Health Agency of Canada announced upcoming changes to Canada’s border measures in relation to COVID-19. The news release was accessed at: <https://www.canada.ca/en/public->

[health/news/2021/11/government-of-canada-announces-adjustments-to-canadas-border-measures.html](https://www.healthnews/2021/11/government-of-canada-announces-adjustments-to-canadas-border-measures.html). Attached as **Exhibit A** is a copy of the News Release.

4. Canada Unity, one of the organizing groups in what would become the Freedom Convoy 2022, posted a memorandum of understanding (MOU) on their website in mid-December 2021. Based on news reporting it is my understanding that copies of the MOU were sent by registered mail to members of the Government of Canada on or about December 10, 2021. Attached as **Exhibit B** is a copy of the Memorandum of Understanding located on the Canada Unity website (<https://canada-unity.com/wp-content/uploads/2022/01/Combined-MOU-Dec03.pdf>).

5. On January 13, 2022, the federal government announced travel requirements that applied to truck drivers entering Canada effective January 15, 2022. Attached as **Exhibit C** is a copy of the Statement from the Public Health Agency of Canada, which can also be found at the following link: <https://www.canada.ca/en/public-health/news/2022/01/requirements-for-truckers-entering-canada-in-effect-as-of-january-15-2022.html>. Attached as **Exhibit D** is a copy of an article from the Globe and Mail dated January 13, 2022 titled “Vaccine mandate for cross-border truckers to take effect; Ottawa calls reversal ‘error’”, which can also be found at the following link: <https://www.theglobeandmail.com/politics/article-vaccine-mandate-truckers-cross-border-ottawa-cbsa/>.

6. Around the same time as the announcement at Exhibit C, a national event called “Freedom Convoy 2022” was planned and promoted on social media. The Facebook page “Freedom Convoy 2022” was created on January 14, 2022 and can be accessed at the following link: <https://www.facebook.com/realFreedomConvoy2022>.

7. On January 22, 2022, the Canadian Trucking Alliance released a statement titled: “Canadian Trucking Alliance Statement to Those Engaged in Road/Border Protests”. The statement can be accessed at the following link: <https://cantruck.ca/canadian-trucking-alliance-statement-to-those-engaged-in-road-border-protests/>. A print-out of the statement is attached to this affidavit as **Exhibit E**.

8. On January 26, 2022, the Ottawa Police Service released a statement titled: “Significant traffic disruptions expected this weekend due to demonstrations”. The Statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?newsId=9d1c61b6-8569-4aec-8481-2f32b7f61780>. A print-out of the statement is attached to this affidavit as **Exhibit F**.

9. On or about January 27, 2022, the National Post posted an article titled: “Freedom Convoy plans to gridlock Ottawa until all vaccine mandates repealed”. The article indicates that it was updated on January 28, 2022. This article can be accessed at the following link: <https://nationalpost.com/news/canada/were-done-with-mandates-freedom-convoy-vows-no-violence-as-up-to-2000-vehicles-head-for-ottawa> and a print-out of the article is attached as **Exhibit G** to this affidavit.

10. On or about January 27, 2022, the National Post posted an article titled: “Ottawa police brace for ‘parallel groups’ when trucker convoy reaches Ottawa: Ottawa police say they are preparing for a range of scenarios this weekend including the potential for violence”. This article can be accessed at the following link: <https://nationalpost.com/news/canada/ottawa-police-brace-for-parallel-groups-when-trucker-convoy-reaches-ottawa> and a print-out of the article is attached as **Exhibit H** to this affidavit.

11. On or about January 28, 2022, The Record and the Hamilton Spectator posted an editorial titled: “‘Freedom Convoy’ must respect peace, order and our government”. This article can be accessed at the following links: <https://www.therecord.com/opinion/editorials/2022/01/28/freedom-convoy-must-respect-peace-order-and-our-government.html> ; <https://www.thespec.com/opinion/editorials/2022/01/28/freedom-convoy-must-respect-peace-order-and-our-government.html> and a print-out of the article is attached as **Exhibit I** to this affidavit

12. On or about January 28, 2022, CBC News posted an article titled: “Police on guard against ‘lone wolf individuals’ as protest convoy arrives in Ottawa”. The article indicates that it was updated on January 29, 2022. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/police-weekend-demonstrations-ottawa-1.6331215> and a print-out of the article is attached as **Exhibit J** to this affidavit.

13. On January 28, 2022, the Toronto Star posted an article titled: “As ‘Freedom convoy’ hits Ottawa, Nova Scotia moves to ward off blockade at New Brunswick border”. This article can be accessed at the following link: <https://www.thestar.com/news/canada/2022/01/28/as-freedom-convoy-hits-ottawa-nova-scotia-moves-to-ward-off-blockade-at-new-brunswick-border.html> and a print-out is attached as **Exhibit K** to this affidavit.

14. On January 29, 2022, the Canadian Trucking Alliance released a statement titled: “Statement by Canadian Trucking Alliance President on Ottawa Protests”. The statement can be accessed at the following link: <https://cantruck.ca/statement-by-canadian-trucking-alliance-president-on-ottawa-protests/>. A print-out of the statement is attached to this affidavit as **Exhibit L**.

15. On or about January 29, 2022, Global News posted an article titled: “Some trucker convoy organizers have history of white nationalism, racism”. The article indicates that it was updated on January 31, 2022. The article can be accessed at the following link: <https://globalnews.ca/news/8543281/covid-trucker-convoy-organizers-hate/> and a print-out of the article is attached as **Exhibit M** to this affidavit.

16. On or about January 29, 2022, CBC News posted an article titled: “Thousands opposed to COVID-19 rules converge on Parliament Hill”, and indicates that it was updated on the same day. The article can be accessed at the following link: <https://www.cbc.ca/news/politics/truck-convoy-protest-some-key-players-1.6332312> and a print-out of the article is attached as **Exhibit N** to this affidavit.

17. On or about January 29, 2022, o.canada.com posted an article titled: “Rideau Centre closes after maskless protesters are seen confronting staff”. The article can be accessed at the following link: <https://o.canada.com/news/local-news/rideau-centre-closes-after-maskless-protesters-are-seen-confronting-staff> and a print-out of the article is attached as **Exhibit O** to this affidavit.

18. From January 29-30, 2022, the Ottawa Police Service released five statements regarding the “weekend demonstrations”. The titles and links to the statements are:

- a. “Update on Weekend Demonstrations”, January 29, 2022, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=01/01/2022&page=2&newsId=9a3d07c2-6915-4e4a-b527-c27f9ccee681>
- b. “Update 2: Weekend Demonstrations”, January 29, 2022, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=01/01/2022&page=1&newsId=98483401-48b2-4c78-b00b-40ba8f571a39>
- c. “Update 3: Weekend Demonstrations”, January 30, 2022, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=01/01/2022&page=1&newsId=52d59a36-1ea9-4bac-a4e4-4859fd6d879c>
- d. “Update 4: Weekend Demonstrations”, January 30, 2022, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=01/01/2022&page=1&newsId=1059aaa8-02c9-4617-8b36-7971c3416d2f>
- e. “Update 5: Weekend Demonstration”, January 30, 2022, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=01/01/2022&page=1&newsId=9bbfb519-7695-4d88-80be-942baa12c223>

Print-outs of all five of the above statements are attached to this affidavit as **Exhibit P**.

19. On or about January 30, 2022, The Times of Israel posted an article titled: “Swastikas, other hate symbols displayed at Canadian protest against COVID mandates”. This article can be accessed at the following link: <https://www.timesofisrael.com/swastikas-other-hate-symbols-displayed-at-canadian-protest-against-covid-mandates/> and a print-out of the article is attached as **Exhibit Q** to this affidavit.

20. On January 31, 2022, Ottawa Police Service released a statement titled: “Chief Peter Sloy remarks during Media availability – January 31, 2022”. This statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?lang=en&newsId=4e505c6b-0e2e-4a69-a9f0-cfccdcb3e542>. A print-out of the statement is attached to this affidavit as **Exhibit R**.

21. On or about January 31, 2022, CTV News Ottawa posted an article titled: “Downtown Ottawa residents describe stress and anxiety of living with ongoing trucker protest”. This article can be accessed at the following link: <https://ottawa.ctvnews.ca/downtown-ottawa-residents-describe-stress-and-anxiety-of-living-with-ongoing-trucker-protest-1.5762108> and a print-out of the article is attached as **Exhibit S** to this affidavit.

22. On or about January 31, 2022, APTN National News posted an article titled: “Soft police approach to Ottawa anti-vax protest reveals ‘pure racism’ say critics”. The article can be accessed at the following link: <https://www.aptnnews.ca/national->

[news/soft-police-approach-to-ottawa-anti-vax-protest-reveals-pure-racism-say-critics/](#)

and a print-out of the article is attached as **Exhibit T** to this affidavit.

23. On February 1, 2022, Ottawa Police Service released a statement titled: “Two arrests in demonstration-related investigations”. The statement can be accessed at the following link:

<https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=8&newsId=bbbb85e-4056-4321-954c-5cf034dc3f07>.

A print-out of the statement is attached to this affidavit as **Exhibit U**.

24. On or about February 1, 2022, CNN posted an article titled: “Ottawa to establish hate incident hotline amid reports of racism and anti-Semitism during protests over Covid-19 mandates”. The article can be accessed at the following link:

<https://www.cnn.com/2022/02/01/americas/canada-ottawa-protests-hate-incidents-hotline/index.html>

and a print-out of the article is attached as **Exhibit V** to this affidavit.

25. On or about February 1, 2022, Ottawa Citizen posted a local news article titled: “Ambulances pelted with rocks during protest; health workers, patients face added stress, delays”. This article can be accessed at the following link:

<https://ottawacitizen.com/news/local-news/ambulances-pelted-with-rocks-during-protest-health-workers-patients-face-added-stress-delays>

and a print-out of the article is attached as **Exhibit W** to this affidavit.

26. On or about February 1, 2022, CTV News Ottawa posted an article titled: “Some residents in downtown Ottawa standing up to the trucker convoy”. This article can be accessed at the following link: <https://ottawa.ctvnews.ca/some-residents-in-downtown-ottawa-standing-up-to-the-trucker-convoy-1.5763579> and a print-out of the article is attached as **Exhibit X** to this affidavit.

27. On February 1, 2022, the Royal Canadian Mounted Police (RCMP) (Alberta) issued a statement titled: “Alberta RCMP statement regarding Coutts border assembly”. The statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-statement-coutts-border-assembly>. A print-out of the statement is attached to this affidavit as **Exhibit Y**.

28. On or about February 1, 2022, the Calgary Herald posted an article titled: “Violence reported at Coutts as RCMP attempt to break up blockade”. The article can be accessed at the following link: <https://calgaryherald.com/news/local-news/rcmp-enforcement-possible-as-coutts-border-blockade-reaches-fourth-day> and a print-out is attached as **Exhibit Z** to this affidavit.

29. On or about February 2, 2022, CTV News Ottawa posted an article titled: “Truck convoy costs Ottawa’s busiest mall millions in lost revenue”. The article can be accessed at the following link: <https://ottawa.ctvnews.ca/truck-convoy-costs-ottawa-s-busiest-mall-millions-in-lost-revenue-1.5765373> and a print-out of the article is attached as **Exhibit AA** to this affidavit.

30. On or about February 2, 2022, CTV News Ottawa posted an article titled: “Ottawa police expect ‘Freedom Convoy’ protest to grow this weekend” and indicates

that it was updated on the same day. This article can be accessed at the following link: <https://ottawa.ctvnews.ca/ottawa-police-expect-freedom-convoy-protest-to-grow-this-weekend-1.5764002> and a print-out of the article is attached as **Exhibit BB** to this affidavit.

31. On or about February 2, 2022, the Ottawa Citizen posted an article titled: “Diesel fumes bring risk of serious health issues for Centretown residents, experts say”. This article can be accessed at the following link: <https://ottawacitizen.com/news/local-news/diesel-fumes-bring-risk-of-serious-health-issues-for-centretown-residents-experts-say> and a print-out of the article is attached as **Exhibit CC** to this affidavit.

32. On February 2, 2022, the RCMP (Alberta) issued a statement titled: “Alberta RCMP statement regarding Coutts border assembly – Update #1”. This statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-statement-coutts-border-assembly-update-1>. A print-out of the statement is attached to this affidavit as **Exhibit DD**.

33. On or about February 2, 2022, the Washington Post posted an article titled: “‘Significant element’ from U.S. involved in self-described ‘Freedom Convoy’ in Canada, official says” and indicates it was last updated the same day. This article can be accessed at the following link: <https://www.washingtonpost.com/world/2022/02/02/freedom-convoy-alberta-blockade-vaccine-mandate-protests/> and a print-out of the article is attached as **Exhibit EE** to this affidavit.

34. On or about February 2, 2022, APTN National News posted an article titled: “Algonquin Nation issues statement saying it ‘does not support’ ceremony, and truckers convoy actions on traditional territory”. This article can be accessed at the following link: <https://www.aptnnews.ca/national-news/algonquin-nation-truckers-convoy-traditional-territory-ottawa/> and a print-out of the article is attached as **Exhibit FF** to this affidavit.

35. On February 3, 2022, the Ottawa Police Service released a statement titled: “Demonstration-Related Traffic Enforcement in Downtown Neighbourhoods”. This statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?newsId=3eae7a92-fdab-4477-9625-e40cf0823eba>. A print-out of the statement is attached to this affidavit as **Exhibit GG**.

36. On or about February 3, 2022, APTN National News posted an article titled: “Tungasuvvingat Inuit says truckers protest in Ottawa causing ‘anxiety and increased fear’”. This article can be accessed at the following link: <https://www.aptnnews.ca/national-news/tungasuvvingat-inuit-says-truckers-protest-in-ottawa-causing-anxiety-and-increased-fear/> and a print-out of the article is attached as **Exhibit HH** to this affidavit.

37. On or about February 4, 2022, CBC News posted an article titled: “GoFundMe and the Ottawa convoy protest – your questions answered” and it was updated that same day. This article can be accessed at the following link:

<https://www.cbc.ca/news/politics/questions-answers-gofundme-convoy-1.6338932>

and a print-out of the article is attached as **Exhibit II** to this affidavit.

38. On February 4, 2022, the Ottawa Police Service released a statement titled: “Ottawa Police Service Implements Increased Measures to Protect Downtown Neighbourhoods”. This statement can be accessed at the following link:

<https://www.ottawapolice.ca/Modules/News/index.aspx?newsId=0f31ea4e-110e-434c-b817-04c3d23f1ede>. A print-out of the statement is attached to this affidavit as

Exhibit JJ.

39. On or about February 4, 2022, CTV News Ottawa posted an article titled: “Tow truck companies rejecting Ottawa police request for help: source”. This article can be accessed at the following link: <https://ottawa.ctvnews.ca/tow-truck-companies-rejecting-ottawa-police-request-for-help-source-1.5768436> and a print-out of the article is attached as **Exhibit KK** to this affidavit.

40. On or about February 5, 2022, the Ottawa Citizen posted an article titled: “Truck Convoy: ‘Our city is under siege’.” This article can be accessed at the following link: <https://ottawacitizen.com/news/local-news/truck-convoy-residents-police-brace-as-protest-numbers-expected-to-swell> and a print-out of the article is attached as

Exhibit LL to this affidavit.

41. On February 5, 2022, the Ottawa Police Service released a statement titled: “Ottawa Police Enforce Perimeter Containment Measures, Charges laid, new RCMP resources announced”. This statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?lang=en&newsId=73848b16-7644-4e56-95c0-767136eff481>. A print-out of the statement is attached to this affidavit as **Exhibit MM**.

42. On or about February 5, 2022, CBC News posted an article titled: “No end in sight to Ottawa protests, not enough resources, says police chief”. The article indicates that it was last updated on February 6, 2022. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/ottawa-protests-police-chief-no-end-in-sight-1.6341192> and a print-out of the article is attached as **Exhibit NN** to this affidavit.

43. On February 5, 2022, the Vancouver Police released a statement titled: “Vancouver Police arrest five during day-long protests”. This statement can be accessed at the following link: <https://vpd.ca/news/2022/02/05/vancouver-police-arrest-five-during-day-long-protests/>. A print-out of the statement is attached to this affidavit as **Exhibit OO**.

44. On February 6, 2022, Cadillac Fairview released a statement titled: “Statement regarding the ongoing closure of CF Rideau Centre”. The Statement can be accessed at the following link: <https://www.cadillacfairview.com/news/Statement-regarding-the-ongoing-closure-of-CF-Rideau-Centre/>. A print-out of the statement is attached to this affidavit as **Exhibit PP**.

45. On February 6, 2022, the City of Ottawa released a statement titled: “Mayor Watson declares state of emergency for Ottawa due to ongoing demonstration”. This statement can be accessed at the following link: <https://ottawa.ca/en/news/mayor-watson-declares-state-emergency-ottawa-due-ongoing-demonstration>. A print-out of the statement is attached to this affidavit as **Exhibit QQ**.

46. On or about February 6, 2022 the Ottawa Citizen posted an article titled: “Province says Ottawa has tools needed to end convoy protest; Watson warns city authorities ‘outnumbered’ by protesters”. The article indicates that it may have been updated on February 7, 2022. This article can be accessed at the following link: <https://ottawacitizen.com/news/local-news/province-says-ottawa-has-tools-needed-to-end-convoy-protest-watson-warns-city-authorities-outnumbered-by-protesters> and a print-out of the article is attached as **Exhibit RR** to this affidavit.

47. On February 6, 2022, Ottawa Police Service released a two statements:

- a. “450+ tickets issued since Saturday morning”,
<https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=6&newsId=0087e6b4-7217-44b3-b17c-124b273da999>
- b. “7 people arrested, 100 tickets issued in Demonstration-Related Enforcement”,
<https://www.ottawapolice.ca/Modules/News/index.aspx?lang=en&newsId=eea9ddff-2d3a-4327-8a2b-34fa5c39579c>.

Print-outs of the above statements are attached to this affidavit as **Exhibit SS**.

48. On or about February 7, 2022, Deutsche Welle (DW.com) posted an article titled: “Canada: Ottawa declares state of emergency amid COVID-19 protests.” This article can be accessed at the following link: <https://www.dw.com/en/canada-ottawa-declares-state-of-emergency-amid-covid-19-protests/a-60681441> and a print-out of the article is attached as **Exhibit TT** to this affidavit.

49. On or about February 7, 2022, CBC News posted an article titled: “Centretown ice cream shop closes after worker reports assault on way to work” and it was updated on the same day. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/moo-shu-ice-cream-employee-assaulted-ottawa-1.6341207> and a print-out of the article is attached as **Exhibit UU** to this affidavit.

50. On or about February 7, 2022, CTV News Ottawa posted an article titled: “Protesters quickly adapting to police measures: Ottawa chief” and it indicates that it was updated the same day. This article can be accessed at the following link: <https://ottawa.ctvnews.ca/protesters-quickly-adapting-to-police-measures-ottawa-chief-1.5770548> and a print-out of the article is attached as **Exhibit VV** to this affidavit.

51. On February 7, 2022, Aljazeera.com posted an article titled: “Canada’s NDP leader says trucker convoy aims to ‘overthrow’ gov’t”. This article can be accessed at the following link: <https://www.aljazeera.com/news/2022/2/7/canada-ndp-leader-trucker-convoy-aims-to-overthrow-govt> and a print-out of the article is attached as **Exhibit WW** to this affidavit.

52. On February 7, 2022, CTV News Ottawa posted an article titled: “Ottawa police dealing with threats, fake calls tying up resources” and it was updated on the same day. This article can be accessed from the following link: <https://ottawa.ctvnews.ca/ottawa-police-dealing-with-threats-fake-calls-tying-up-resources-1.5771623> and a print-out of this article is attached as **Exhibit XX** to this affidavit.

53. On February 7, 2022, the City of Ottawa released a statement titled: “Council condemns demonstration and asks for additional support”. This statement can be accessed at the following link: <https://ottawa.ca/en/news/council-condemns-demonstration-and-asks-additional-support>. A print-out of the statement is attached to this affidavit as **Exhibit YY**.

54. On February 7, 2022, Jim Watson, Mayor of Ottawa released his letter to Prime Minister Justin Trudeau and Minister of Public Safety, Marco Mendicino. A copy of the letter can be accessed at the following link: https://www.scribd.com/document/557485524/Letter-to-PM-Trudeau-and-Minister-Mendicino-RE-Enforcement-Resources-Request-Feb-7-2022#from_embed. Attached as **Exhibit ZZ** is a print-out of this link with the letter embedded.

55. On February 7, 2022, Public Safety Canada released a statement titled: “Joint Statement from Ministers Blair, LeBlanc, Fortier, Mendicino and Alghabra”. The statement can be accessed at the following link: <https://www.canada.ca/en/public-safety-canada/news/2022/02/joint-statement-from-ministers-blair-leblanc-fortier-mendicino-and-alghabra.html>. A print-out of the statement is attached to this affidavit as **Exhibit AAA**.

56. On or about February 7, 2022 the National Post posted an article from The Canadian Press titled: “Judge has ‘heard enough,’ grants interim injunction against truckers honking in Ottawa”. This article can be accessed at the following link: <https://nationalpost.com/news/canada/judge-has-heard-enough-grants-injunction-against-truckers-honking-in-ottawa> and a print-out of the article is attached as **Exhibit BBB** to this affidavit.

57. The February 7, 2022 injunction order can be accessed at the following link: <https://www.truckerrelease.ca/order.pdf>. The injunction order was also posted online by the Ottawa Police Service through a statement released on February 8, 2022 titled: “Enforcement of Court Order in Downtown Core”. The statement is accessible at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=6&newsId=567bc422-5221-4f1b-9cf1-d57760e39f18>. A print out of the injunction order and the Ottawa Police Service statement regarding same are attached as **Exhibit CCC** to this affidavit

58. On February 8, 2022, Ottawa Police Service released a statement titled: “Ottawa Police Service Makes 23 Arrests in Relation to Demonstration – 1,300 Tickets Issued”. The statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=6&newsId=461f5055-3bb2-4c3b-895e-94d0dbad8588>. A print-out of the statement is attached to this affidavit as **Exhibit DDD**.

59. On February 8, 2022, Windsor Police Service released a statement titled: “Update in Relation to Gatherings and Demonstrations on Huron Church Road at the Ambassador Bridge”. This statement can be accessed at the following link: <https://windsorpolice.ca/newsroom/news-update/february/Pages/February-8-2022-Update-1.aspx>. A print-out of this statement is attached to this affidavit as **Exhibit EEE**.

60. On or about February 8, 2022 CBC News posted an article titled: “Large number of children among protesters hampering response, police say” and it indicates it was updated on the same day. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/ottawa-police-update-convoy-february-8-protest-1.6343814> and a print-out of the article is attached as **Exhibit FFF** to this affidavit. An article entitled “The children of the ‘Freedom Convoy’: Kids with protesting parents complicate police response” was also posted by the Washington Post on February 17, 2022. This article can be accessed at the following link: <https://www.washingtonpost.com/world/2022/02/17/freedom-convoy-children-ottawa-protest/> and a print-out of the article is attached as **Exhibit GGG** to this affidavit.

61. On or about February 8, 2022, ABC News posted an article titled: “COVID-19 protests threaten border trade between Canada, US”. This article can be accessed at the following link: <https://abcnews.go.com/International/wireStory/canadas-covid-19-protests-threaten-border-trade-us-82749571> and a print-out of the article is attached as **Exhibit HHH** to this affidavit.

62. On or about February 8, 2022, CBC News posted an article titled: “Tow truck operator under attack after removing illegal shack at protesters’ request”, and indicates that it was updated on the same day. The article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/ottawa-convoy-protest-shack-towed-reaction-1.6342357> and a print-out of the article is attached as **Exhibit III** to this affidavit.

63. On February 9, 2022, Ottawa Police Service released a statement titled: “Child and youth safety at Ottawa demonstrations”. The statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=6&newsId=a6a015c7-f687-4397-af48-2e37f9df5c4f>. A print-out of the statement is attached to this affidavit as **Exhibit JJJ**.

64. On or about February 9, 2022, Global News posted an article titled: “Windsor officials requesting assistance as Ambassador Bridge blockade continues”. The article indicates that it was updated on February 10, 2022. This article can be accessed at the following link: <https://globalnews.ca/news/8606062/southern-ontario-convoy-demonstrations/> and a print-out of the article is attached as **Exhibit KKK** to this affidavit.

65. On February 9, 2022, Canada-United States Business Association (CUSBA) released a statement titled: “Canadian, US Business Associations Call for Immediate Action to Open Ambassador Bridge” (which is dated February 8, 2022). This statement can be accessed at the following link: <https://www.cusbaonline.com/canadian-us->

[business-associations-call-for-immediate-action-to-open-ambassador-bridge](#). A print-out of the statement is attached to this affidavit as **Exhibit LLL**.

66. On or about February 10, 2022, CityNews posted an article titled: “Police confirm flood of calls came from truck convoy protesters, U.S.-based addresses”. This article can be accessed at the following link: <https://ottawa.citynews.ca/police-beat/police-confirm-flood-of-calls-came-from-truck-convoy-protesters-us-based-addresses-5051149> and a print-out of the article is attached as **Exhibit MMM** to this affidavit.

67. On February 10, 2022, Ottawa Police Service released a statement titled: “Ottawa Police Service Works to Reduce Occupation Footprint - - 1,775 Tickets Issued”. The statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=5&newsId=6a1ea331-1152-4592-a365-884abcd8778c>. A print-out of the statement is attached to this affidavit as **Exhibit NNN**.

68. On February 10, 2022, the Prime Minister released a statement titled: “Prime Minister Justin Trudeau convenes the Incident Response Group”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/10/prime-minister-justin-trudeau-convenes-incident-response-group>. A print-out of this statement is attached to this affidavit as **Exhibit OOO**.

69. On February 10, 2022, the National Post posted an article titled: “Protest organizer: No intent to topple government ... and no plan to leave until COVID mandates lifted”. This article can be accessed at the following link: <https://nationalpost.com/news/politics/protest-organizer-no-intent-to-topple-government-and-no-plan-to-leave-until-covid-mandates-lifted> and a print-out of the article is attached as **Exhibit PPP** to this affidavit.

70. On February 11, 2022, the RCMP (Manitoba) released a statement titled: “Blockade continuing to block border in Emerson”. This statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/blockade-continuing-block-border-emerson>. A print-out of this statement is attached to this affidavit at **Exhibit QQQ**.

71. On February 11, 2022, the Prime Minister released a statement titled: “Prime Minister Justin Trudeau speaks with the President of the United States of America Joe Biden”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/11/prime-minister-justin-trudeau-s-peaks-president-united-states-america-joe-0> and a print-out of this statement is attached to this affidavit as **Exhibit RRR**.

72. On or about February 11, 2022, several different organizations issued statements related to these events, including the following:

- a. Canada's Building Trades Unions issued a statement which can be accessed at the following link: <https://buildingtrades.ca/statement-by-canadas-building-trades-unions-on-blockades/>
- b. The Canadian Cattlemen's Association issued a statement titled: "Canadian Agriculture and Food Industry Calls for Government Action to Restore Essential Transport and Trade Corridors". This statement can be accessed at the following link: <https://www.cattle.ca/canadian-agriculture-and-food-industry-calls-for-government-action-to-restore-essential-transport-and-trade-corridors>
- c. Unifor issued a statement titled: "Unifor condemns 'Freedom Convoy' actions". This statement can be accessed at the following link: <https://www.unifor.org/news/all-news/unifor-condemns-freedom-convoy-actions>.
- d. Amnesty International Canada issued a statement titled: "Amnesty International Canada Statement on 'Freedom Convoy' Blockade". This statement can be accessed at the following link: <https://amnesty.ca/news/ottawa-protests-statement-11-feb-2022/> .

Print-outs of the above four statements are attached to this affidavit as **Exhibit SSS**.

73. On February 11, 2022, the Province of Ontario declared a State of Emergency and issued the following regulations on February 11 and 12, 2022: O. Reg 69/22 (Declaration of Emergency), O Reg. 70/22 (Confirmation of Declaration of Emergency) and O. Reg. 71/22 (Critical Infrastructure and Highways). These regulations can be accessed at the following links:

- (a) <https://www.ontario.ca/laws/regulation/r22069>
- (b) <https://www.ontario.ca/laws/regulation/220070>
- (c) <https://www.ontario.ca/laws/regulation/220071>

Print-outs of the above regulations are attached to this affidavit as **Exhibit TTT**.

Ontario Premier Doug Ford's press conference declaring the State of Emergency has been posted on CPAC's YouTube channel with the title "Truck protests: Ontario

Premier Doug Ford declares province-wide state of emergency – Feb. 11, 2022” and can be viewed at the following link: <https://www.youtube.com/watch?v=LjECIc4hAo>.

74. On February 11, 2022, Windsor Police Service released a statement titled: “Message to Demonstrators from Windsor Police Service”. This statement can be accessed at the following link: <https://windsorpolice.ca/newsroom/news-update/february/Pages/February-10-2022-Update-1.aspx>. A print-out of this statement is attached to this affidavit as **Exhibit UUU**.

75. On or about February 11, 2022, The Globe and Mail published an article titled: “Injunction granted to clear Ambassador Bridge blockade after Doug Ford announces state of emergency”. This article can be accessed at the following link: <https://www.theglobeandmail.com/canada/article-ontario-premier-ford-announces-state-of-emergency-over-trucker/> and a print-out of the article is attached as **Exhibit VVV** to this affidavit.

76. On February 11, 2022, the City of Windsor issued a press release including a copy of the injunction order. The press release and injunction order can be accessed by the following link: <https://www.citywindsor.ca/Newsroom/Pages/Injunction-Granted-by-Ontario-Superior-Court.aspx> and a print-out of the press release and order are attached to this affidavit as **Exhibit WWW**.

77. On or about February 11, 2022, CNBC posted an article titled: “U.S. pressures Canadian authorities to end border blockades” and indicates that it was last updated on the same day. This article can be accessed at the following link: <https://www.cNBC.com/2022/02/11/us-urges-canada-to-use-federal-powers-to-ease->

[border-protest-disruption.html](#) and a print-out of this article is attached as **Exhibit XXX** to this affidavit.

78. On February 12, 2022, the Prime Minister released a statement titled: “Prime Minister Justin Trudeau convenes the Incident Response Group on the ongoing illegal blockades”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/12/prime-minister-justin-trudeau-convenes-incident-response-group-ongoing> and a print-out of this statement is attached to this affidavit as **Exhibit YYY**.

79. On February 12, 2022, Ottawa Police Service released two statements:

- a. “Ottawa Police Service Deploying All Available Officers to Enforce Neighbourhood Safety” which can be accessed at the following link:
<https://www.ottawapolice.ca/Modules/News/index.aspx?lang=en&newsId=64873352-2809-47ce-bc46-f57f4bf05d45>.
- b. “Ottawa Police Service Establish Integrated Command Centre to Coordinate Enforcement”, which can be accessed at the following link:
<https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=5&newsId=bed085e8-7c29-4b03-beb5-85862d682fd4>

Print-outs of the above two statements are attached to this affidavit as **Exhibit ZZZ**.

80. On February 12, 2022, the RCMP (Manitoba) released a statement titled: “UPDATE #2 – Emerson border crossing – February 12, 2022”. The statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/update-2-emerson-border-crossing-february-12-2022> and a print-out of the statement is attached to this affidavit as **Exhibit AAAA**.

81. On or about February 12, 2022, CBC News posted an article titled: “Vaccine mandate protesters force highway closure at Canada-U.S. border in Surrey as rallies enter 3rd weekend” and it was updated on the same day. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/british-columbia/surrey-border-protest-feb-12-1.6349787> and a print-out of the article is attached as **Exhibit BBBB** to this affidavit.

82. Also on or about February 12, 2022, The Toronto Star posted an article titled: “Protestors square off with police at Ambassador Bridge, as demonstrations across Ontario continue despite emergency measures” and indicates that it was updated on February 13, 2022. This article can be accessed at the following link: <https://www.thestar.com/politics/federal/2022/02/12/ottawa-freedom-convoy-protests-continue-despite-ontarios-new-emergency-measures.html> and a print-out of the article is attached as **Exhibit CCCC** to this affidavit.

83. On or about February 12, 2022, CityNews posted an article titled: “Protesters tear down fence erected to protect National War Memorial”. This article can be accessed at the following link: <https://ottawa.citynews.ca/local-news/protesters-tear-down-fence-erected-to-protect-national-war-memorial-5058238> and a print-out of the article is attached as **Exhibit DDDD** to this affidavit.

84. On or about February 12, 2022, the Detroit Free Press posted an article titled: “Trucks are gone from Ambassador Bridge, but more protesters arrive on foot”, and it indicates it was updated the same day. The article can be accessed from the following link: <https://www.freep.com/story/news/local/michigan/2022/02/12/ambassador-bridge-truck-protest-police/6764936001/> and a print-out of the article is attached as **Exhibit EEEE** to this affidavit.

85. On February 13, 2022, the RCMP (Manitoba) released a statement titled: “UPDATE #3 – Emerson border crossing – February 13, 2022” and can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/update-3-emerson-border-crossing-february-13-2022> and a print-out of the statement is attached to this affidavit as **Exhibit FFFF**.

86. On February 13, 2022, the RCMP (BC) released two statements:

- a. “Update on situation near the Pacific Highway Border Crossing” and can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73453>.
- b. “Update: Arrests at protest near Pacific Highway Border Crossing” and can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73452>.

Print-outs of these two statements are attached to this affidavit as **Exhibit GGGG**.

87. On February 13, 2022, Windsor Police Services released a statement titled: “Demonstration Update”. This statement can be accessed at the following link: <https://windsorpolice.ca/newsroom/news-update/february/Pages/February-13-2022-Update-1.aspx> and a print-out of this statement is attached to this affidavit as **Exhibit HHHH**.

88. On February 14, 2022, the RCMP (Alberta) released a statement titled: “Alberta RCMP make arrests at Coutts Border Blockade”. This statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-make-arrests-coutts-border-blockade>. A further statement was released titled: “Alberta RCMP make arrests at Coutts Border Blockade – Update 1” and can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-make-arrests-coutts-border-blockade-update-1>. Print-outs of these statements are attached to this affidavit as **Exhibit IIII**.

89. On February 14, 2022, the RCMP (BC) released a statement titled: “Law enforcement activity continues near the Pacific Highway Border Crossing”. This statement can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73467> and a print-out of this statement is attached to this affidavit as **Exhibit JJJJ**.

90. On February 14, 2022, Windsor Police Service released a statement titled: “Police Road Closure Update”. This statement can be accessed at the following link: <https://windsorpolice.ca/newsroom/news-update/february/Pages/February-14-2022-Update-1.aspx> and a print-out of this statement is attached as **Exhibit KKKK**.

91. On or about February 14, 2022, CBC News posted an article titled: “3 weekends, 1 hot tub: Ottawa residents reach protest boiling point” and indicates that it was last updated on the same day. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/ottawa/counter-protests-mayor-deal-anger-police-1.6350450> and a print-out of the article is attached as **Exhibit LLLL** of this affidavit.

92. On February 14, 2022, Public Safety Canada released a statement titled: “Federal Government declares a public order emergency under the *Emergencies Act* to end disruptions, blockades and the occupation of the city of Ottawa”. The statement can be accessed at the following link: <https://www.canada.ca/en/public-safety-canada/news/2022/02/federal-government-declares-a-public-order-emergency-under-the-emergencies-act-to-end-disruptions-blockades-and-the-occupation-of-the-city-of-ottawa.html> and a print-out of the statement is attached to this affidavit as **Exhibit MMMM**.

93. On or about February 14, 2022, The Globe and Mail published an article titled: “Prime Minister Justin Trudeau invokes Emergencies Act to try to bring an end to the blockades”. The article indicates that it was updated on February 15, 2022. This article can be accessed at the following link: <https://www.theglobeandmail.com/politics/article-prime-minister-trudeau-to-discuss-ending-trucker-blockades-with-first/> and a print-out of the article is attached as **Exhibit NNNN** to this affidavit.

94. On or about February 14, 2022, The Toronto Star posted an article titled: “Justin Trudeau invokes Emergencies Act to stop convoy protests”. The article indicates that

it was updated on February 15, 2022. This article can be accessed at the following link: <https://www.thestar.com/politics/federal/2022/02/14/ottawa-protesters-remain-defiant-as-federal-government-ramps-up-emergency-response.html?rf> and a print-out of the article is attached as **Exhibit OOOO** to this affidavit.

95. On February 15, 2022, the Department of Finance Canada released a statement titled: “Canada invokes the *Emergencies Act* to limit funding of illegal blockades and restore public order”. The statement can be accessed at the following link: <https://www.canada.ca/en/departement-finance/news/2022/02/canada-invokes-the-emergencies-act-to-limit-funding-of-illegal-blockades-and-restore-public-order.html> and a print-out of the statement is attached to this affidavit as **Exhibit PPPP**.

96. On February 15, 2022, the Deputy Prime Minister of Canada, Chrystia Freeland released a statement titled: “Canada invokes the Emergencies Act to limit funding of illegal blockades and restore public order”. This statement can be accessed at the following link: <https://deputypm.canada.ca/en/news/news-releases/2022/02/15/canada-invokes-emergencies-act-limit-funding-illegal-blockades-and> and a print-out of the statement is attached to this affidavit as **Exhibit QQQQ**.

97. On February 15, 2022, the RCMP (BC) released a statement titled: “Arrests at the Pacific Highway Border Crossing”. This statement can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73485> and a print-out of this statement is attached to this affidavit as **Exhibit RRRR**.

98. On or about February 15, 2022, Global News posted an article titled: “Ottawa police Chief Peter Sloyly resigns amid ‘freedom convoy’ blockade” and indicates that it was last updated on the same day. This article can be accessed at the following link: <https://globalnews.ca/news/8621091/ottawa-police-peter-sloyly-resigns/> and a print-out of the article is attached as **Exhibit SSSS** to this affidavit.

99. On February 15, 2022, the RCMP (Alberta) released two statements:

- a. “Alberta RCMP make arrests at Coutts Border Blockade – Update 2”, <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-update-the-coutts-border-protests>, which is a video statement
- b. “Alberta RCMP make arrests at Coutts Border Blockade – Update 3”, <https://www.rcmp-grc.gc.ca/en/news/2022/alberta-rcmp-make-arrests-coutts-border-blockade-update-3>

A print-out of the statement relating to Update 3 is attached to this affidavit as **Exhibit TTTT**.

100. On February 15, 2022, the RCMP (Manitoba) released a statement titled: “Update #4- Emerson Border Crossing”. The statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/statement-chief-superintendent-rob-hill-officer-charge-criminal-operations-the-manitoba-0> and a print-out of this statement is attached to this affidavit as **Exhibit UUUU**.

101. On February 15, 2022, Windsor Police Service released a statement titled: “Police Enforcement Results Since the Onset of the Demonstrations”. This statement can be accessed at the following link: <https://windsorpolice.ca/newsroom/news-update/february/Pages/February-15-2022-Update-2.aspx> and a print-out of the statement is attached to this affidavit as **Exhibit VVVV**.

102. On February 15, 2022, the Winnipeg Free Press posted an article titled: “Premier’s letter to PM contrasts with public remarks about blockade”. This article can be accessed at the following link: <https://www.winnipegfreepress.com/local/premiers-letter-to-pm-contrasts-with-public-remarks-about-blockade-576213742.html> and a print-out of the article is attached as **Exhibit WWWW** to this affidavit.

103. On February 16, 2022, Ottawa Police Service released three statements:

- a. “Unified Command focused on Safe Resolution to Unlawful Protests”, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=5&newsId=0aae45ba-df82-490c-9bf6-a17426127c30>
- b. “A further Notice to Demonstrators”, <https://www.ottawapolice.ca/Modules/News/index.aspx?lang=en&newsId=1bc1b5ab-51e3-4860-8937-b181d4475989>
- c. “Statement by Interim Chief Steve Bell to City Council”, <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=4&newsId=1e4940bf-a4cc-47b8-a22a-a3975191957a>

Print-outs of the above statements are attached to this affidavit as **Exhibit XXXX**.

104. On or about February 16, 2022, The Globe and Mail published an article titled: “Police issue order for Ottawa convoy protestors to leave immediately”. This article can be accessed at the following link: <https://www.theglobeandmail.com/politics/article-police-issue-order-for-ottawa-convoy-protesters-to-leave-immediately/> and a print-out of the article is attached as **Exhibit YYYY** to this affidavit.

105. On February 16, 2022, Prime Minister Trudeau released a statement titled: “Prime Minister Justin Trudeau convenes the Incident Response Group on the ongoing illegal blockades”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/16/prime-minister-justin-trudeau-convenes-incident-response-group-ongoing> and a print-out of the statement is attached to this affidavit as **Exhibit ZZZZ**.

106. On February 16, 2022, the RCMP (Manitoba) released a statement titled: “Update #5 – Blockade at Emerson border crossing now cleared”. This statement can be accessed at the following link: <https://www.rcmp-grc.gc.ca/en/news/2022/update-5-blockade-emerson-border-crossing-now-cleared> and a print-out of the statement is attached to this affidavit as **Exhibit AAAAA**.

107. On February 17, 2022, Prime Minister Trudeau released a statement titled: “Prime Minister Justin Trudeau convenes the fifth Incident Response Group meeting on the illegal blockade and occupations”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/17/prime-minister-justin-trudeau-convenes-fifth-incident-response-group> and a print-out of the statement is attached to this affidavit as **Exhibit BBBBB**.

108. On February 17, 2022, Ottawa Police Service released a statement titled: “Secured Area Established”. This statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?newsId=55f169a4-101f-4860-83c6-8c645f9bfe86> and a print-out of the statement is attached to this affidavit as **Exhibit CCCCC**.

109. On February 17, 2022, The New York Times posted an opinion article titled: “The Giddy, Terrifying Siege of Ottawa”. The opinion article can be accessed at the following link: <https://www.nytimes.com/2022/02/17/opinion/ottawa-protest-convoy.html> and a print-out is attached as **Exhibit DDDDD** to this affidavit.

110. On February 18, 2022, the Speaker of the House of Commons, Hon. Anthony Rota, M.P., released a statement titled: “Police operation – House will not sit on Friday, February 18”. This statement can be accessed at the following link: <https://www.ourcommons.ca/Content/Newsroom/Articles/News-Speaker-No-Sitting-18-02-2022-e.pdf> and a print-out of the statement is attached to this affidavit as **Exhibit EEEEE**.

111. On February 18, 2022, Prime Minister Trudeau released a statement titled: “Prime Minister Justin Trudeau convenes the sixth Incident Response Group meeting on the illegal blockade and occupations”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/18/prime-minister-justin-trudeau-convenes-sixth-incident-response-group> and a print-out of the statement is attached to this affidavit as **Exhibit FFFFF**.

112. On or about February 18, 2022, the Ottawa Citizen posted an article titled: “The occupation of Ottawa: a timeline.” The article indicates it may have been updated on February 24, 2022. This article can be accessed at the following link: <https://ottawacitizen.com/news/local-news/the-occupation-of-ottawa-a-timeline> and a print-out of the article is attached as **Exhibit GGGGG** to this affidavit.

113. On February 19, 2022, Prime Minister Trudeau released a statement titled: “Prime Minister Justin Trudeau convenes the seventh Incident Response Group meeting on the illegal blockade and occupations”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/19/prime-minister-justin-trudeau-convenes-seventh-incident-response-group> and a print-out of the statement is attached to this affidavit as **Exhibit HHHHH**.

114. On or about February 19, 2022, CBC News posted an article titled: “The Ottawa convoy has ‘shattered norms’ for protest in Canada. Will we see more of it?” and indicates that it was last updated on the same day. This article can be accessed at the following link: <https://www.cbc.ca/news/canada/trucker-freedom-convoy-new-normal-1.6355574> and a print-out of the article is attached as **Exhibit IIIII** to this affidavit.

115. On February 19 2022, the RCMP (B.C.) released four statements:

- a. “Update: Law enforcement activity continues near the Pacific Highway Border Crossing”, which can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73550>
- b. “Update – Pacific Highway Border Crossing”, which can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73551>
- c. “Update: Police investigating after members of the media swarmed by protesters in Surrey” which can be accessed at the following link: <https://surrey.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2126&languageId=1&contentId=73553>

- d. “Update: Protesters depart and roads re-open near the Pacific Highway Border Crossing” which can be accessed at the following link: <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2100&languageId=1&contentId=73554>

Print-outs of the above four statements are attached to this affidavit as **Exhibit JJJJJ**.

116. On February 20, 2022, Prime Minister Trudeau released a statement titled: “Prime Minister Justin Trudeau convenes the eighth Incident Response Group meeting on the illegal blockade and occupations”. This statement can be accessed at the following link: <https://pm.gc.ca/en/news/readouts/2022/02/20/prime-minister-justin-trudeau-convenes-eighth-incident-response-group> and a print-out of the statement is attached to this affidavit as **Exhibit KKKKK**.

117. On or about February 20, 2022, Global News posted an article titled: “Letter shows Alberta asked for feds’ help with Coutts blockade as Kenney claims province had resources”. The article indicates that it was last updated on February 21, 2022. This article can be accessed at the following link: <https://globalnews.ca/news/8634427/letter-alberta-asked-federal-help-coutts-illegal-blockade-sources/> and a print-out of the article is attached as **Exhibit LLLLL** to this affidavit.

118. On or about February 20, 2022, CTV News Ottawa posted an article titled: “False reports of woman’s death at Ottawa protest example of misinformation, say police”, and it indicates that it was updated the same day. This article can be assessed at the following link: <https://ottawa.ctvnews.ca/false-reports-of-woman-s-death-at-ottawa-protest-example-of-misinformation-say-police-1.5788873> and a print-out of the article is attached as **Exhibit MMMMM** to this affidavit.

119. On February 21, 2022, Ottawa Police Service released a statement titled: “Update on Police Operations to Remove Unlawful Protesters”. The statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=3&newsId=8df7ae35-59ae-469a-a7e0-5a049ef87b46> and a print-out of the statement is attached to this affidavit as **Exhibit NNNNN**.

120. On February 22, 2022, Ottawa Police Service released a statement titled: “Sparks St. Now Open to Pedestrians – Secure Area Further Reduced”. The statement can be accessed at the following link: <https://www.ottawapolice.ca/Modules/News/index.aspx?keyword=&date=02/01/2022&page=2&newsId=ba37e4b9-93f4-42ed-a992-ba9a52929d53> and a print-out of the statement is attached to this affidavit as **Exhibit OOOOO**.

121. On February 23, 2022, the RCMP released two national statements:

- a. “Revocation of the Emergencies Act”, <https://www.rcmp-grc.gc.ca/en/news/2022/revocation-the-emergencies-act>

- b. “Enforcement under the Emergencies Act – Unfreezing of accounts”, <https://www.rcmp-grc.gc.ca/en/news/2022/enforcement-the-emergencies-act-unfreezing-accounts>

Print-outs of the above statements are attached to this affidavit as **Exhibit PTTTT**.

122. On or about March 19, 2022, Toronto Star posted an article titled: “Was it really about vaccine mandates – or something darker? The inside story of the convoy protests”. As of March 30, 2022, the article indicates it was last updated “6 days ago”.

This article can be accessed at the following link:

<https://www.thestar.com/news/canada/2022/03/19/was-it-really-about-vaccine-mandates-or-something-darker-the-inside-story-of-the-convoy-protests.html> and a print-out of the article is attached as **Exhibit QQQQQ** to this affidavit.

Other “Freedom Convoy” Court Proceedings

Li, et al. v Barber, et al., CV-22-00088514-00CP

123. On February 4, 2022, Zexi Li commenced a proposed class action against various defendants, including those identified as organizers of the “Freedom Convoy”.

The original Statement of Claim in this proceeding can be accessed at the following link: <https://www.truckerrelease.ca/claim.pdf>. A copy of the Claim is attached as

Exhibit LLLLL to this affidavit. The website: www.truckerrelease.ca also has a link to the Fresh as Amended Statement of Claim, although it does not appear that this has been issued as of yet. The Fresh as Amended Statement of Claim can be accessed at the following link: <https://www.truckerrelease.ca/claim-amended.pdf>. A copy of this claim is attached as **Exhibit RRRRR** to this affidavit.

124. On February 7, 2022, the Honourable Justice McLean issued an order for an interlocutory injunction, which is referenced above at paragraph 57 and attached as Exhibit BBB to this affidavit.

125. On or about February 15, 2022, the plaintiff in this action served and filed a motion record for a Motion for Interlocutory Injunction returnable February 16, 2022. Attached as **Exhibit SSSSS** is a copy of the Plaintiff's motion record dated February 15, 2022, omitting the cases which were included in the record.

126. On February 17, 2022, the plaintiff in this action brought an *ex parte* Mareva injunction. Reasons for the decision were delivered on February 22, 2022 and reported as [2022 ONSC 1176](#). A copy of the Reasons are attached as **Exhibit TTTTT** to this affidavit. A further endorsement was released on February 28, 2022 and reported as [2022 ONSC 1351](#). A copy of this Endorsement is attached as **Exhibit UUUUU** to this affidavit.

127. On March 9, 2022, further motions were heard in this proceeding relating to (but not limited to) motions to amend, motions relating to the Mareva Injunction and motions from banks. The Endorsement to these motions was released March 10, 2022 and reported as [2022 ONSC 1543](#). A copy of this Endorsement is attached as **Exhibit VVVVV** to this affidavit.

The Corporation of the City of Windsor v Persons Unknown, CV-22-00030791-0000

128. On February 18, 2022, the Ontario Superior Court of Justice heard a motion by the City of Windsor for injunctive relief, amongst other things. Reasons were released on February 22, 2022, and the case is reported as [2022 ONSC 1168](#). A copy of the decision is attached as **Exhibit WWWW** to this affidavit.

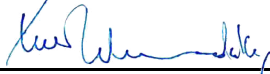
City of Ottawa v Persons Unknown, CV-22-88569

129. On February 14, 2022, an ex-parte motion for an Interim Injunction was brought by the City of Ottawa. The Attorney General of Canada (AGC) filed a motion record for leave to intervene on February 14, 2022. A copy of the AGC's Motion Record dated February 14, 2022 is attached as **Exhibit XXXXX** to this affidavit.

130. On February 15, 2022, the City of Ottawa released a statement titled: "City granted injunction to address disregard for municipal by-laws". The statement can be accessed at the following link: <https://ottawa.ca/en/news/city-granted-injunction-address-disregard-municipal-laws>. A print-out of the statement is attached to this affidavit as **Exhibit YYYY**. The Order issued in that injunction can be accessed at the following link: https://documents.ottawa.ca/sites/documents/files/Feb_15_Issued_Intervenor_Order_CV-22-88569.pdf and a copy is attached to this affidavit as **Exhibit ZZZZ**. Reasons for the decision in this motion were released on February 22, 2022 and is attached as **Exhibit AAAAAA** to this affidavit.

131. I make this affidavit to provide background context for the matters considered in Federal Court File Nos. T-306-22, T-316-22, T-347-22 and T-382-22 and for no further or other purpose.

SWORN before me through video-conferencing from the City of Toronto to the City of Oshawa in the Province of Ontario on April 4, 2022



Commissioner for Taking Affidavits
Nur Muhammed-Ally, Counsel



Rebecca Coleman