

**BEFORE THE COMMISSION OF INQUIRY
INTO THE INVESTIGATION OF THE BOMBING OF AIR INDIA FLIGHT 182**

**APPLICATION FOR BROADER STANDING
OF THE WORLD SIKH ORGANIZATION OF CANADA**

PART I: ORDER SOUGHT

1. On August 9, 2006, the World Sikh Organization of Canada (“WSO”) received Intervenor status on the following basis:

The participation of the WSO is limited, in the first instance, to written submissions on matters that affect the reputational interests of the Sikh community.

2. The *Rules Applicable To All Intervenors* further contemplate that an Intervenor may make an application in writing to the Commission for a broader role.
3. The WSO is applying for a broader role at this Inquiry, to do the following:
 - a) An Order granting the Applicant the right to cross-examine witnesses on issues related to the reputational interests of the Sikh community;
 - b) An Order granting the Applicant the right to make written and oral submissions on all the Terms of Reference.

PART II: GROUNDS FOR THE APPLICATION

A: Right to Cross Examination of Witnesses

4. In the first instance, the WSO asks this Commission to permit it to cross-examine witnesses on issues that arise within the scope of the WSO's current standing, ie. on the reputational interests of the Sikh community.
5. The WSO makes this request, on 2 grounds:
 - a) Ensuring that the full spirit of the right to intervene is implemented; and
 - b) Change of circumstances based on the Proceedings thus far.

Cross Examination and the Purpose of Intervention

6. Granting the right to cross-examine witnesses is not unusual at a Commission of Inquiry. Indeed, in the Walkerton Inquiry, most if not all of the Interveners were granted the right to cross-examine witnesses:

My first criterion has been to ensure the Inquiry is thorough. When in doubt, I have opted in favour of inclusion. In doing so, I recognize there will be overlapping positions and a potential for duplication.

Ontario, Parliamentary Inquiry, Appendix E (II), Report of the Walkerton Inquiry, Ontario, : Queen's Printer, 2002

7. It is respectfully submitted that in a fact-based Inquiry, the right to provide submissions is meaningless unless this Intervener is given an opportunity to cross examine witnesses. This is particularly so when an Intervener such as the WSO, has shown a genuine and deep interest in the Proceedings, by expending valuable resources to ensure that WSO counsel is present at the Inquiry on a regular basis.

8. In an appellate context, limiting the rights of an Intervenor to written submissions is appropriate, as the issues before the court are normally legal, rather than factual. However, in a fact based Inquiry process such as this, it is very difficult, if not impossible, for this Intervenor to effectively make submissions on issues affecting the reputational interests of the Sikh community, without the factual foundation to support them. It is submitted that a factual foundation can only be established with the right to call evidence, or to cross-examine witnesses.

Change of Circumstances and Issues Arising from the Proceedings

9. There are 4 distinct categories of Canadians particularly affected by this tragedy – the victims, their families, the Sikh community, and broader Canadian society. The victims and their families are ably represented by counsel and have full rights to participate in the Inquiry. The general interests of Canadians are being advanced through the Commission counsel.
10. In contrast, the Sikh community, who's interests cannot be fully represented by Commission counsel, has extremely limited rights of intervention, and does not have adequate opportunity to protect its interests or reputation within the scope of the intervention granted to the WSO thus far. Despite the fact that the impact of this Inquiry and its Findings is uniquely different for the Sikh community, then that of all other Intervenors, the Sikh community is given the same right only to provide written submissions.
11. At this Inquiry, evidence has been lead which has impacted on the reputational interests of the Sikh community. In cases where further testing of that evidence has been necessary, the WSO counsel have approached various counsel for the Parties, and sought their cooperation in putting certain questions to witnesses, in order to clarify or establish certain facts which go directly to the reputational interests of the Sikh community. However, the mandate and the interests of the WSO are different than that of the Parties,

and this approach has not been successful. As a result, evidence affecting the reputational interests of the Sikh community has gone into this Inquiry, without it being adequately tested. This is of grave concern as this Commission of Inquiry will be making certain findings and recommendations based on the evidence lead at the Inquiry. If critical pieces of evidence have not been lead, or the strength of certain evidence has not been tested through cross-examination, then the Commission is left with making its Findings and Recommendations on an incomplete or inaccurate record.

12. Examples of circumstances when the participation of the WSO in the cross-examination of witnesses would have been useful to this Inquiry, and critical to the Intervention mandate of the WSO, are as follows.

13. On September 25, 2007, Manjit Singh gave evidence about significant events within the Sikh community following Air India. At one point, Mr. Singh stated that there were no memorial services held by Sikhs for the victims of Air India. This fact, if accepted, would lead one to the conclusion that the Sikh community broadly sympathized with the bombing of Air India, thus clearly affecting the reputational interests of the Sikh community. In fact, Mr. Singh was incorrect in his recollection. Had the WSO been afforded the opportunity to cross-examine Mr. Singh, they would have been able to establish that numerous memorials were held by the Sikh community for the victims of Air India. For example, the following article appeared in the Globe and Mail:

Terror in the Skies Hindus, Sikhs forget bitterness to unite in grief over loss

Monday June 24, 1985

By Zuhair Kashmeri and Victor Malarek

Canadian Hindus and Sikhs, embroiled in a bitter conflict over recent events in their homeland, were united in grief yesterday as they braved the news of the air disaster that killed many men, women and children of their community...Yesterday they gathered together in prayer for all the victims at Sikh and Hindu temples in Toronto and Montreal...Similarly, Gobinder Singh Randhawa of the World Sikh Organization in Toronto said Sikh temples in the

city began reciting psalms from their scriptures for Hindu and Sikh families. “In grief, all of us are human beings and not Sikhs and Hindus,” Mr. Randhawa said.

14. Mr. Singh further gave evidence at the Inquiry that members of the Sikh community were afraid to cooperate with the RCMP investigation due to fears that their family members in India would be persecuted. This evidence left the impression that the Sikh community as whole was not cooperating with the police, and that the desire for “self-preservation” overwrote the desire to bring forward evidence for the sake of the overall public good. This evidence, if accepted, would lead one to the conclusion that the Sikh community as a whole had made the decision not to cooperate with Canadian authorities. Had the WSO been permitted to cross-examine witnesses, they would have been able to establish that Sikh community leaders encouraged people to cooperate with police. For example, numerous press-releases were issued by the WSO asking anyone with information regarding the Air India bombing, to cooperate with police.

15. On October 3, 2007, a panel of three witnesses from the Canada Revenue Agency (CRA) were presented to the Commission on the issue of registration. Despite the fact that the WSO had some information to suggest that the CRA was improperly relying on media reports in denying gurdwaras (Sikh places of worship) charitable status under the Income Tax Act, the WSO was not able to pose any questions that would have aided the Commission in providing recommendations to improve and correct the present regime. Furthermore, although Commission counsel agreed to ask some questions raised by the WSO regarding this inappropriate reliance on media reports to deny gurdwaras charitable status, he did not/was not permitted to, ask questions of the panel that would have identified that the fact that this charitable status was being denied to one specific group. Had the WSO been able to cross-examine the CRA witnesses, it would have been able to put to the Panel, the following excerpt from a letter sent to a gurdwara, which was denied charitable status:

According to media reports, these disputes represent struggles for control over the treasuries of the temples that are rooted in the political question of providing support for an independent Khalistan state. In our view, the goal of an independent Khalistan is clearly a political purpose and is not an intrinsic part of

the tenets and practices of the Sikh religion. As such, management of the affairs of a gurdwara in such a way as to promote this goal, or to provide political or material support for the pursuit of this goal, would not be allowable under the Income Tax Act requirements pertaining to registration as a charity.

16. The above excerpt clearly suggests that there is a widely held assumption, by CRA officials, that donations made to gurdwaras will end up funding political movements rather than being used for religious purposes. This biased perspective, if unchallenged, will clearly result in the continuation of the practice of denying legitimate Sikh places of worship from obtaining charitable status based on the CRA's inappropriate reliance on false and misleading media reports. Had the WSO been permitted to cross-examine the CRA witnesses on this point, it would have been able to establish the extent to which this approach is a widely held belief within the CRA, and whether or not policy is shaped by the CRA in keeping with this biased belief.
17. On September 25, 2007, Inspector Cunningham of the RCMP made certain statements related to the interview of a suspect in Indian police custody, Lal Singh. His testimony clearly suggested that the RCMP believed Lal Singh's statements regarding his own lack of involvement in Air India, but implicating his involvement with or connection to people who were responsible for the Air India tragedy.
18. Contrary to Inspector Cunningham's suggestions, the WSO has information that the RCMP was aware (or should have been aware) that at least some of the statements made by Lal Singh were factually incorrect. Despite this, the WSO was unable to pose any questions to Mr. Cunningham that would have aided this Commission in determining how much weight to give his evidence.
19. Entered into evidence as Exhibit CAF0329, at the Inquiry, was a booklet containing statements reported to be made by Lal Singh to the RCMP during his interrogation in India. In those statements, Lal Singh is said to have met with certain persons within the Sikh community, who knew or were directly involved with the bombing of Air India. One of those persons mentioned by Lal Singh, Gian Singh Sandhu, was also named

directly by Inspector Cunningham at the Inquiry, during his cross-examination by Mr. Shore. If the WSO had been given the opportunity to cross-examine Mr. Cunningham on his evidence, it would have been able to establish that Mr. Cunningham, and/or the RCMP, in fact were aware that Lal Singh was not being truthful about his alleged dealings with Gian Singh Sandhu. For example, Lal Singh and Gian Singh Sandhu never met in New York city as alleged by Lal Singh, and nor did Gian Singh Sandhu speak at the Madison Square Gardens Convention in New York city, also as alleged by Lal Singh.

20. Gian Singh Sandhu is the Senior Policy Advisor of the WSO, and is also its founding President. By linking his name publicly to a suspect in the Air India bombing, the reputational interests of the WSO, and by extension, the Sikh community, have clearly been affected. As the only Sikh organization present at the Inquiry, the ability of the WSO to adequately represent the reputational interests of the Sikh community, is contingent upon its own reputation. By falsely linking Mr. Sandhu to Lal Singh, the ability of the WSO to adequately protect the reputational interests of the Sikh community is seriously compromised.
21. On September 21, 2007, Jack Hooper of CSIS, gave evidence in his examination in chief, regarding CSIS's investigation of the alleged involvement of the Government of India in the bombing of Air India. Mr. Hooper stated, "And I think it's important to know that we looked at that possibility largely as a function of analytical rigour and due diligence. I think there were certain indicators our [sic] there that spoke to that possibility, however remote, and we had an obligation to examine that possibility and assess its viability, and that's what we did."
22. Assistant Commissioner Gary Bass of the RCMP, who headed the Air India Task Force, paints a different picture. He writes in an internal memo, Point 14, Issue 3, the following:

Involvement of the Government of India agents in the bombings has been raised on several occasions. The SIRC Review had serious concerns over CSIS handling of this issue. CSIS's reply to this possibility was that it had passed it to the RCMP to investigate. SIRC reports that the RCMP looked into this aspect

and determined the allegation to be without foundation. The truth of the matter is that the RCMP never thoroughly investigated the issue, which means that apparently no-one did.

- i) Some serious concerns regarding possible Indian Government involvement which at trial may permit the defence to explore very deeply into what the RCMP and CSIS know on this issue. As I understand it, this is an area CSIS and our government will not wish to get into as it may severely impact relations with India.
- ii) There is a very real possibility that one or more of the targets we propose to wiretap are GOI or RAW [Research and Analysis Wing – India’s CIA], or informants for GOI, RAW, or CSIS. The implications here are obvious.

Ref.: Zuhair Kahshmeri and Brian McAndrew, *Soft Target – India’s Intelligence Service and its Role in the Air India Disaster*, 2nd ed. James Lorimer & Company Ltd., Toronto, 2005, p. xv.

- 23. Had the WSO been afforded the right to cross-examine, the above memo from Gary Bass would have been put to Mr. Hooper, in an attempt to ascertain the accuracy of Mr. Bass’s assertion that the possible involvement of the Government of India in the Air India tragedy, was never properly investigated by CSIS, contrary to Mr. Hooper’s assertion above. The fact that the RCMP and CSIS seemingly have a very different take on whether or not a critical theory regarding the identity of the culprits behind Air India, was properly investigated, goes to the heart of items (i) (adequate terrorist threat assessment) and (ii) (CSIS and RCMP dynamic) of the Terms of Reference of this Inquiry.
- 24. The WSO submits that it is critical for this Commission of Inquiry to determine what, if any, involvement there was in the Air India bombing, by the Government of India, and whether this was properly investigated by either CSIS or the RCMP. Ascertaining this issue, would assist the Commission in determining what impact, if any, this possible involvement by the Government of India in the bombing of Air India, may have had on the investigation itself, the failure to lay charges in a timely manner, and the failure to obtain any convictions regarding the bombing. In addition, the plausibility of this theory, and whether or not it was properly investigated, goes directly to the heart of items

- (iv) (adequacy of Canadian legislation to address the issue of terrorist financing) and (v) (adequacy of current legislation regarding witness protection) of the Terms of Reference.
25. Further, the WSO submits that the broad intervention mandate of the WSO, ie. to protect the reputational interests of the Sikh community, of necessity requires an exploration of what, if anything, the RCMP or CSIS did in order to accurately assess the involvement of the Government of India in the bombing of Air India Flight 182. This goes to item (i) of the Terms of Reference, ie. whether there were any deficiencies in the assessment by Canadian government officials of the potential threat posed by Sikh terrorism, before or after 1985, or their response to that threat. If there is evidence to suggest an alternative motive to the bombing of Air India Flight 182, ie. to destabilize the Sikh separatist movement in India by destroying the reputation of the Sikh community, this ought to be fully explored. The victims' families, Sikh community, and the Canadian public, deserve no less.
26. There is further evidence to suggest that the role of the Government of India in the bombing of Air India Flight 182, needs to be fully explored. On September 24, 2007, Lorne Schwartz, of the RCMP, gave evidence about the information obtained from Mr. Lakhbir Singh Brar, during the course of several interviews conducted by the RCMP. At Exhibit P101, Tab 9, page 3/5, Mr. Brar is purported to have said, "It would be impossible to have the bomb-laden luggage cleared through check-in and security in the normal fashion, without the Government of India involvement". Again, this was a point that would have been followed up by the WSO, had the WSO been granted the right to cross-examine witnesses. Further exploration of this point would also be of assistance to this Commission under (iiv) of the Terms of Reference (adequacy of passenger and baggage screening procedures).
27. In a book called, "Open Secrets – India's Intelligence Unveiled", by Maloy Krishna Dar, (© 2005, Manas Publications, New Delhi) former Joint Director of the Intelligence Bureau of India, Mr. Dar spends an entire chapter on the activities of Indian intelligence

agents in Canada in the 1980's and 1990's. At page 293, Mr. Dar speaks about his mission while posted in Canada in 1983:

- *Penetration of a few selected gurudwaras.
- *Cultivation of a few identified targets amongst the most vocal section of the Sikh community.
- *Penetration of the Punjabi print and electronic media and control of the print and electronic media operated by the non-Sikh segments of the people of Asiatic and Indian origin
- *Creation of a few clandestine human assets in the 'lumpen' segment of the Sikh workforce in Canada, who were more drawn to the separatist leaders and hate-preaching priests.
- *To reach out to the Indian community with saturated supplies of audio and videotapes on current affairs in India and specially filmed tapes on the atrocities committed by the Bhindranwale goons.
- *To convert the '*India News*' to a quality publication with the help of a newly acquired fast printing/copying machine.
- *To meet the Canadian Foreign Office mandarins and the RCMP point men at regular intervals to brief them about developments back in India and to share whatever '*open*' information the Indian Mission could cull out from the community through '*open*' means.
- *To target the mainstream Canadian print and electronic media and to sell the Indian side of the story.
- *To maintain ironclad cover and not to betray my involvement in intelligence generation.
- *To befriend key diplomats in Bangladesh and Sri Lanka Missions with view to reaching some targeted members of the Pakistan Mission.
- *To generate few 'friends' amongst the Canadian Members of Parliament.

Ref.: Maloy Krishna Dar, *Open Secrets – India's Intelligence Unveiled*, (New Delhi: Manas Publications, 2005) at page 293.

28. In a book entitled, 'Betrayal – The Spy Canada Abandoned', David Kilgour, a highly respected Canadian Parliamentarian and author, writes about his interviews with Ryszard Paszkowski, who was recruited by the RCMP in 1984 to be a spy for Canada. Mr. Kilgour explains that in 1986, Paszkowski was flown to Rome to participate in a secret meeting, which occurred after the bombing of Air India Flight 182. Mr. Kilgour explains the way in which Paszkowski, at this meeting, was asked to be involved with a plan to blow up an Air India plane in Europe. Further, Mr. Kilgour also explains that Paszkowski was suspicious that the plan was primarily directed at subduing the Canadian

Sikh community, since according to Paszkowski, the Canadian Government had been having trouble with the Sikhs. Further, Kilgour suggests that CSIS had been searching for someone it could blame for the Air India bombing and that the plane bombing Paszkowski was asked to be a part of, was a way in which the Canadian Government could cast suspicion on the Sikh community.

Ref.: Kilgour, David, *Betrayal: The Spy Canada Abandon* (Scarborough, Ontario: Prentice Hall Canada Inc., 1994), chapter 9.

29. In a book entitled, ‘Soft Target – The Real Story Behind the Air India Disaster,’ respected Globe and Mail and Toronto Star journalists, Zuhair Kashmeri and Brian McAndrew, write about their investigation of the Air India bombing, and their conclusion that the bombing was masterminded by the Government of India to discredit the Sikh separatist movement in Punjab. “Our purpose in writing this book is to make people aware of the grave injustice suffered by a group of new Canadians – the Sikhs. For several years, India has been engaged in a devious and ruthless operation to manipulate and destabilize Canada’s Sikh population. The operation has been orchestrated by India’s intelligence service and has left the Sikh community estranged from Canadian society. It has also lead to death and destruction.”

Ref.: Zuhair Kahshmeri and Brian McAndrew, *Soft Target – India’s Intelligence Service and its Role in the Air India Disaster*, 2nd ed. James Lorimer & Company Ltd., Toronto, 2005, page xxiv

30. It is respectfully submitted that the reputation of the Sikh community has clearly suffered as a result of the Air India tragedy. In recognition of this, this Commission of Inquiry has provided the WSO with the opportunity to make submissions on issues that affect the reputational interests of the Sikh community. However, it is our submission that the right to make written submissions is meaningless in the context of this Inquiry without the right to cross-examine witnesses. By granting the WSO with the right to cross-examine witnesses, the WSO would have the ability to pose questions to further explore matters affecting the reputational interests of the Sikh community, in order to ensure that this Commission is afforded with the most accurate and complete evidence upon which to base any conclusions.

B: Right to Make Oral and Written Submissions on all the Terms of Reference

31. In its 2006 submissions for standing, the WSO provided this Commission with detailed background information on the organization. However, in order to further establish the basis upon which we are seeking broader standing, we wish to highlight the following.
32. The mandate of the WSO extends to addressing matters beyond the immediate needs of the Sikh community or its reputation. Indeed, the mandate additionally is to promote and advocate for the protection of human rights for all individuals, irrespective of race, religion, gender, ethnicity, and social and economic status.
33. To effect this broader mandate, the WSO has provided the following:
 - a) Consultative Status with the United Nations Economic and Social Council (from 1993 to 1995);
 - b) Presentation to the World Conference Against Racism (2001);
 - c) Consultations with the Refugee Review Tribunals of Australia, United States and the Canadian Immigration and Refugee Board;
 - d) Presentation to the Standing Committee on Justice and Human Rights, on Bill C-36, Canada's Anti-Terrorism Legislation; Presentations to Canadian Senate and House Committees on Bills C-16/C-18 (Citizenship and Immigration);
 - e) Presentations to Canadian Senate and House Committees on Bills C-16/C-18 (Citizenship and Immigration);
 - f) Consultations and Submissions to the Canadian Department of Foreign Affairs on issues of foreign policy, including Mutual Legal Assistance Treaties;
 - g) Consultations with Canadian Department of Employment and Immigration on immigration policy development;
 - h) Consultations with the Ministry of Multiculturalism; and

- i) Consultations with Committee reviewing Canada Customs and Revenue/Solicitor General policies on non-for profit and charitable status for cultural organizations (2000-2001).

34. The WSO has been lobbying parliamentarians for an inquiry commission on the Air India tragedy since 1985 and has appeared at the following committees and commissions;
 - a) the report of the Honourable Bob Rae entitled *Lessons to Be Learned* of November 23, 2005,
 - b) the 1991-1992 Security Intelligence Review Committee review of Canadian Security Intelligence Service activities in regard to the destruction of Air India Flight 182.

35. The WSO also has a substantial and direct interest in the Factual Inquiry in that information resulting from this Inquiry will be directly relevant to the work that the WSO does in assisting individuals with complaints about CSIS, the RCMP, OPP and other security-intelligence agencies.

36. In this respect, WSO represents the interests of all Canadians. It has a unique interest in ensuring that Canadian legislation, institutions, policies and practices are designed to protect those interests and to prevent failures such as those that would appear to have occurred in this case. This interest is broader than that of any one individual or of any specific constituent group.

37. WSO's longstanding concern, involvement, and influence in national security, intelligence and policing issues in Canada and its acknowledged expertise in these areas means it has a direct and substantial interest in the rights of not only Canadian Sikhs, but all or any citizens whose rights and freedoms are similarly at risk. Indeed the WSO's specific and persistent call for this very inquiry with terms of reference that match very closely with what has ultimately been ordered demonstrates that it has a substantial interest in the outcome of the Inquiry.

38. WSO's interest and expertise clearly goes beyond the "reputational interests of the Sikh community".
39. The WSO submits that there has been a change of circumstances from the original application date, such that would warrant a review of the scope of the WSO's intervention for the purposes of making written and oral submissions.
40. Specifically, it is submitted that the active presence of the WSO at the Air India Inquiry, indicates the strong interest of the WSO in these Proceedings. This is in marked contrast to the other Intervenors, most of whom were granted much broader standing to comment on the different Terms of Reference, and yet have been noticeably absent from these Proceedings.
41. The WSO has expended considerable resources in ensuring that Counsel is present at these Proceedings on a regular basis. We respectfully submit that this Commission of Inquiry could benefit extensively from the WSO's broader participation at this Inquiry, as have the numerous governmental, non-governmental, and other legal entities before whom WSO has appeared in the past.
42. The Sikh community's interests are not isolated solely to its reputation – the Sikh community is comprised of a diverse group of dynamic and active participants in Canadian society. Perhaps more so than any other ethnic community in Canada, Canadian-Sikhs have been deeply affected by the Air India tragedy. Not only were there innocent members of the Sikh community who also lost their lives in the Air India blast, but the Sikh community has been the main target of all police investigations and suspicion.
43. The WSO can offer the unique experience of the Sikh community as the aftermath of this tragedy unfolded, in order to enable this Commission to make more informed recommendations on all of the Terms of Reference. As the only Sikh

organization present at this Inquiry, our participation at a much broader level is even more critical. The WSO possesses at least as much expertise as the other “religious or cultural based” Intervenors who are permitted to make submissions on the broader Terms of Reference. Yet the unique experience of the Sikh community, offers a different, but no less informed, perspective.

44. Based on the above, it is submitted that the purpose of an inquiry is to not only find out what went wrong, but also to find out why things went wrong, so that future tragedies like this can be averted and the public can be reassured that Canadian authorities are doing everything within their power to protect all Canadians, while still ensuring that the fundamental rights of all Canadians are protected. In this manner, a public inquiry must of necessity, include investigative, preventative and public confidence components.
45. It is respectfully submitted that these components are strengthened with the increased participation of the WSO.

PART III: PARTICULARS OF STANDING REQUESTED

46. With respect to a grant of full Intervenor standing in Parts I and II of the Inquiry the WSO submits that such Standing include the following:
 - a) access to documents collected by the Commission, subject to the Rules of Procedure and Practice;
 - b) advance notice of documents which are proposed to be introduced into evidence;
 - c) advance provision of statements of anticipated evidence;
 - d) the opportunity to suggest witnesses to be called by the Commission Counsel, failing which an opportunity to apply to the Commissioner to lead the evidence of a particular witness;

- e) the opportunity to cross-examine witnesses on matters affecting the reputational interests of the Sikh community;
- f) the opportunity to make oral and written closing submissions on all aspects of the Terms of Reference;
- g) such further and other relief as this Commission sees fit.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Dated at Ottawa, Ontario on 12th October, 2007.

PALBINDER K. SHERGILL

SHERGILL & COMPANY
Suite 211-9547 152nd Street
Surrey, B.C. V3R 5Y5
Tel: (604) 588 -7337
Fax: (604) 588 -7338
Palbinder K. Shergill

PRADEEP CHAND

LANG MICHENER LLP
300-50 O'Connor Street
Ottawa, Ontario K1P 6L2
Tel: (613) 232-7171
Fax: (613) 231-3191
Pradeep Chand

Counsel for the Applicant, World Sikh Organization of Canada