

IN THE MATTER OF THE COMMISSION OF INQUIRY INTO THE
INVESTIGATION OF THE BOMBING OF AIR INDIA FLIGHT 182, issued
under Part I of the Inquiries Act.

IN THE MATTER OF A MOTION for Standing for the Inquiry, by the
Canadian Coalition for Democracies, through its legal counsel David B.
Harris.

MOTION FOR
STANDING

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Counsel for the Canadian Coalition for Democracies

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MOTION FOR STANDING

- 1.- The Canadian Coalition for Democracies hereby formally applies for standing as intervenor for the Inquiry;
- 2.- Such standing is sought for the entirety of the mandate of the Inquiry.
- 3.- The Canadian Coalition for Democracies has clearly ascertainable perspectives essential to the Commissioner's mandate.
 - (a) The Canadian Coalition for Democracies (hereinafter also "Coalition" and "CCD") is a not-for-profit organization that is generally recognized as a multi-ethnic, multi-religious Canadian national human rights organization and international affairs' "think tank" dedicated to the protection and expansion of democracy and democratic principles in a secure Canada and stable world.
 - (b) The Coalition has a large paid Canadian membership.
 - (c) The Coalition's website, <http://canadiancoalition.com>, attracts significant Canadian and international interest and participation at a rate of 1.6 million visits per year.
 - (d) The Canadian Coalition for Democracies has advanced its goals through, *inter alia*, close study of developments and policy bearing on intelligence, terrorism and national security.

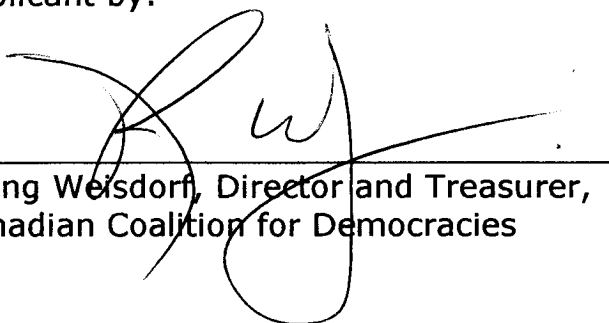
- (e) This study has, since the CCD's founding in 2003, benefited from the participation of Coalition Executive and Senior Fellows who have served, or otherwise had serious involvement in, related fields in law, intelligence, counterterrorism, academe, journalism, and public policy, and some of whom have testified before Canadian parliamentary and American Congressional bodies in relation to these subjects. Reflected in these efforts has been the Coalition's commitment to the need to mount a vigorous, responsible defence against terrorism and associated subversion, in order to safeguard free and democratic societies at home and abroad.
- (f) Based upon this background, the Coalition maintains regular and direct contact with parliamentarians and government leadership, consulting with and making frequent representations to the Office of the Prime Minister, Ministers of the Crown, and diverse other senior Canadian offices and officials. The Coalition also works informally on issues of terrorism and democracy with non-governmental organizations in Canada and the United States of America.
- (g) The Coalition was prominent in urging the federal government and Members of Parliament to call a public inquiry into the Air India disaster on behalf of its members, and out of respect for the families of those lost, and their need for truth and reconciliation in this matter. CCD has met with members of the families of the disaster and with members of the Indo-Canadian community, in order to better understand the challenges faced by the families and communities involved.
- (h) The Coalition's Senior Fellow for National Security was chosen to speak as an advocate at the side of Members of Parliament and terror victims and their families – including Air India families – at the Parliamentary Press Gallery press conference launch of a multi-party parliamentary initiative aimed at securing through legislation the right of terror victims to sue terrorists and their enablers for damages, wherever in the world the offenders might be found, and whomever they might be.

- (i) The Coalition, particularly through its South Asian – including Indo-Canadian Hindu and Muslim – Executive members and officers, has examined, from policy, legal, political and security perspectives, matters understood to fall within the remit of the Inquiry, and has commented publicly and encouraged informed public discussion about these matters.
- (j) Since 2004, the Coalition has worked on issues of terrorist financing in Canada, with particular reference to the use of ostensible charities for related purposes, an area of concern reflected in the Inquiry's terms of reference.
- (k) Consistent with the Inquiry's terms of reference, the Coalition has considered the subject of terrorism-related trials, and has a strong interest in representing its views in this regard to the Commission.
- (l) Coalition personnel have served as speakers and media commentators on intelligence and terrorism, terrorism and the law, terror financing in Canada, the Air India disaster, international affairs, and democratic rights and responsibilities, in most media outlets across Canada, including print, radio, cable, and internet. As well, members of the Coalition have appeared on PBS, CNN, Fox News, MSNBC, BBC, and been quoted or published in foreign print media ranging from *US News and World Report* to the *New York Times* and the *Jerusalem Post*. This public-education component of CCD activity holds potential to assist in the information-gathering and interpretative aspects of the Commissioner's work.

On the basis of the foregoing, and any further reasons as may be anticipated in oral submissions at Ottawa, July 2006, or at any other time convenient to the Inquiry, Applicant Canadian Coalition for Democracies seeks standing as intervenor.

DATED at Ottawa, July 17, 2006.

Canadian Coalition for Democracies,
Applicant by:



Irving Weisdorf, Director and Treasurer,
Canadian Coalition for Democracies

(s) David B. Harris

David B. Harris (Legal Counsel)
David B. Harris, Barrister and Solicitor

To: Commission of Inquiry into the
Investigation of the Bombing of
Air India Flight 182
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Suite 401
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**AFFIDAVIT OF IRVING WEISDORF
IN SUPPORT OF MOTION FOR STANDING**

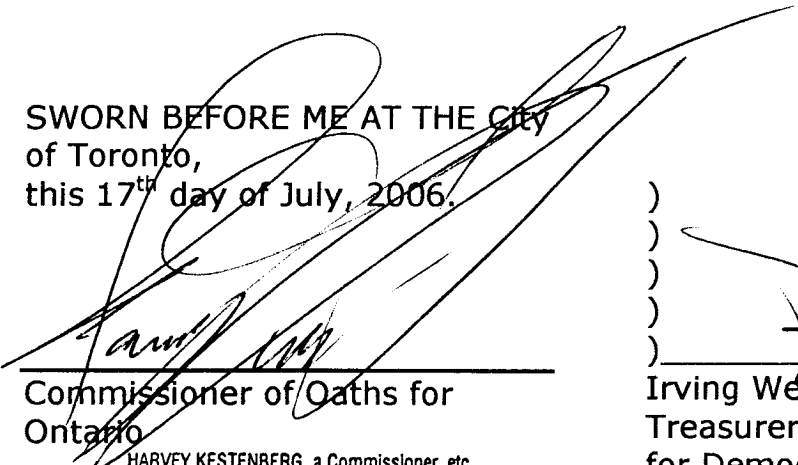
I, Irving Weisdorf, of the City of Toronto, Province of Ontario, make oath and say as follows:

- 1.- I, Irving Weisdorf, depose this affidavit in support of the application of the Canadian Coalition for Democracies, for standing as intervenor for the Inquiry;
- 2.- Such standing is sought for the entirety of the mandate of the Inquiry.
- 3.- The Canadian Coalition for Democracies has and represents clearly ascertainable perspectives which would enhance the work of the Commissioner and be essential to the Inquiry's activities.
 - (a) The Canadian Coalition for Democracies (hereinafter also "Coalition" and "CCD") is a not-for-profit organization that is generally recognized as a multi-ethnic, multi-religious Canadian national human rights organization and international affairs' "think tank" dedicated to the protection and expansion of democracy and democratic principles in a secure Canada and stable world.
 - (b) The Coalition has a large paid Canadian membership.

- (c) I am advised by Alastair Gordon, the President of CCD and the administrator of the Coalition's website, <http://canadiancoalition.com>, that the said website attracts significant Canadian and international interest and participation at a rate of approximately 1.6 million visitors per year.
- (d) The Canadian Coalition for Democracies has advanced its goals through, *inter alia*, close study of developments and policy bearing on intelligence, terrorism and national security.
- (e) This study has, since the CCD's founding in 2003, benefited from the participation of Coalition Executive and Senior Fellows who have served, or otherwise had serious involvement in, related fields in law, intelligence, counterterrorism, academe, journalism, and public policy, and some of whom have testified before Canadian parliamentary and American Congressional bodies in relation to these subjects. Reflected in these efforts has been the Coalition's commitment to the need to mount a vigorous, responsible defence against terrorism and associated subversion, in order to safeguard free and democratic societies at home and abroad.
- (f) Based upon this background, the Coalition maintains regular and direct contact with parliamentarians and government leadership, consulting with and making frequent representations to the Office of the Prime Minister, Ministers of the Crown, and diverse other senior Canadian offices and officials. The Coalition also works informally on issues of terrorism and democracy with non-governmental organizations in Canada and the United States of America.
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- (h) better understand the challenges faced by the families and communities involved.
- (i) The Coalition's Senior Fellow for National Security was chosen to speak as an advocate at the side of Members of Parliament and terror victims and their families – including Air India families – at the April 2005 Parliamentary press conference launch of a multi-party parliamentary initiative aimed at securing through legislation the right of terror victims to sue terrorists and their enablers for damages, wherever in the world the offenders might be found, and whomever they might be.
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SWORN BEFORE ME AT THE City
of Toronto,
this 17th day of July, 2006.



Commissioner of Oaths for
Ontario

HARVEY KESTENBERG, a Commissioner, etc.,
Regional Municipality of York, for
Kestenberg, Rabinowicz & Partners LLP,
Chartered Accountants,
Expires May 3, 2008.

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Irving Weisdorf, Director and
Treasurer, Canadian Coalition
for Democracies

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