

COMMISSION OF INQUIRY INTO THE SPONSORSHIP PROGRAM AND
ADVERTISING ACTIVITIES

APPLICATION FOR FULL PARTY STANDING AND FOR FUNDING BY THE

LIBERAL PARTY OF CANADA
and of the
LIBERAL PARTY OF CANADA (QUEBEC)

DATE OF PRESENTATION

April 4th, 2005, 9:30 a.m.

Complexe Guy-Favreau
200 René-Lévesque Blvd. West
Montreal, Quebec

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*APPLICATION FOR FULL PARTY STANDING AND FOR FUNDING BY THE
LIBERAL PARTY OF CANADA AND LIBERAL PARTY OF CANADA (QUEBEC)*

- [1] The Applicants, Liberal Party of Canada and the Liberal Party of Canada (Quebec) (collectively "the Liberal Party") hereby apply to change their status in the current proceedings from that of an Intervenor to that of a Full Party.
- [2] The grounds for the change of status are that it has become progressively apparent to the attorneys for the Liberal Party of Canada that Commission Counsel intends to present evidence dealing with the relationship (if any) between several witnesses and parties to these proceedings and donations they may have made to the Liberal Party of Canada.
- [3] In fact, in his opening statement of the Phase 1B hearings on February 28th, 2005, Commission Counsel, Me Bernard Roy stated that:

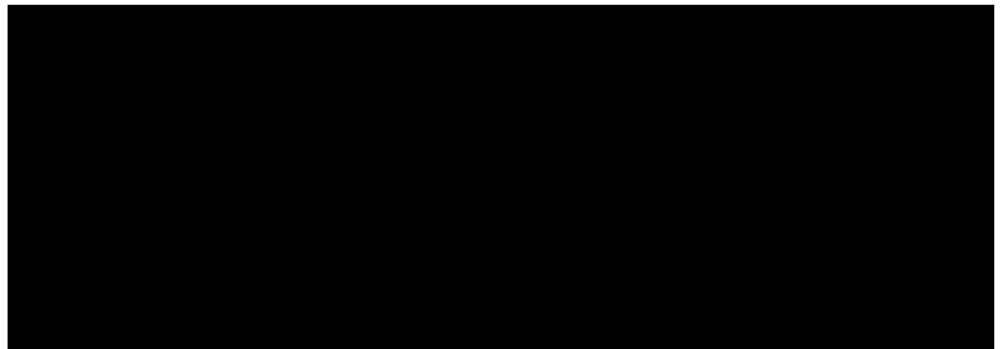
Nous avons aussi prévu au calendrier faire entendre certains organisateurs d'événements commandités et faire toute preuve supplémentaire nécessaire à la détermination de la question de savoir si la distribution des fonds de commandites ou d'activités publicitaires a entraîné directement ou indirectement des dons ou contributions de nature politique.

[4] As well, in several of the “will says” disclosed to parties’ attorneys, the undersigned attorneys have also noted that there are sections entitled “relations avec le parti Libéral du Canada”.

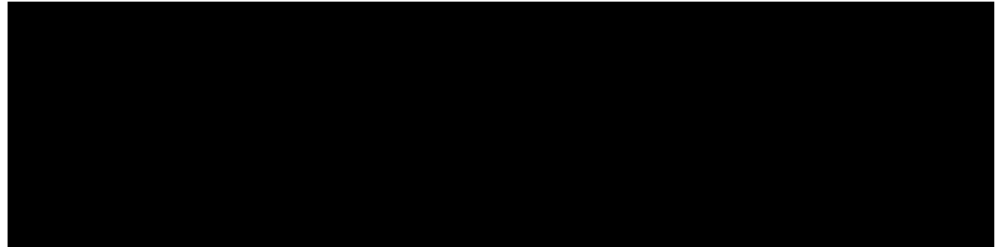
[5] In the view of counsel, prior to Phase 1B hearings, there was no evidence disclosed previously that in any way implicated the Liberal Party in any improper activities.

[6] However, testimony provided by Jean Brault as well as certain statements made by Bernard Thiboutot now assert improper practices did occur. These assertions may harm the interests of the Liberal Party.

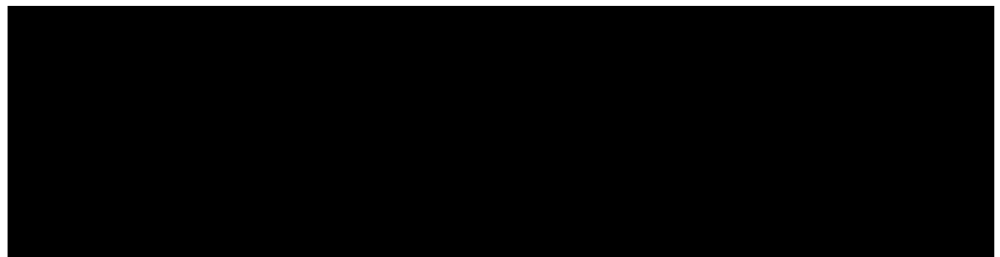
[7]



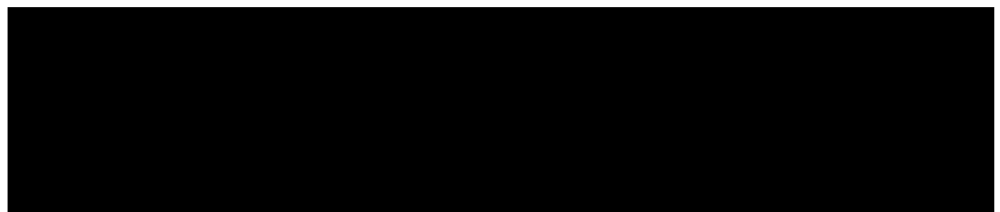
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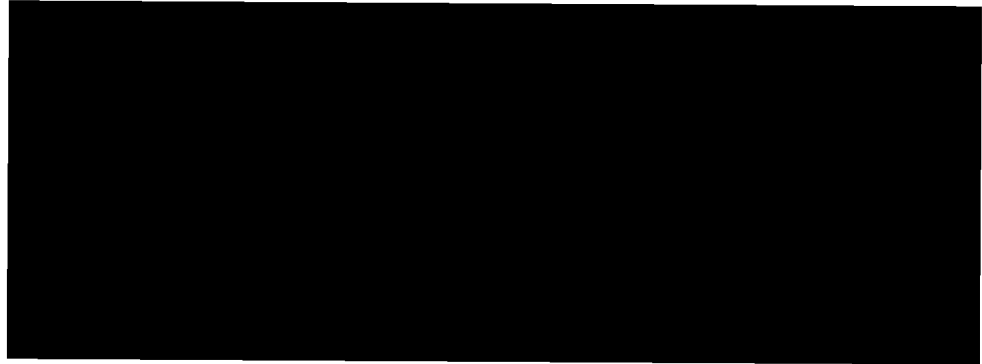
[9]



[10]



[11]



[12] Based on the aforementioned assertions – and any similar such claims that may emerge in future testimony - the Liberal Party has taken the additional step of asking RCMP to investigate whether the Party was also victim of such collusion.

[13] Consequently, the Liberal Party feels that a change of status to full standing is required in order to fully participate in determining the true facts and to ensure that anyone who may have violated the trust placed in them by the Liberal Party of Canada are dealt with appropriately and to the fullest extent provided for by law.

[14] The current government appointed this Commission and remains fully committed to ensuring that the full truth is revealed, in order to ensure that the alleged abuses never occur again.

[15] The Liberal Party believes that with full standing, it could contribute to helping the Commission fulfill its mandate and it will also allow the Liberal Party to take all appropriate measures to ensure that its reputation is respected, while at the same time ensuring that wrongdoers are punished.

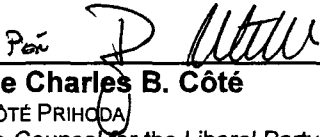
[16] At present, with the simple status of Intervener, this is not possible.

[17] If allegations of misconduct are made during the course of these hearings, without the Liberal Party having full party standing, it would be too late for the Liberal Party to intervene, to correct false allegations or, in the alternative, demonstrate that these individuals colluded to obtain

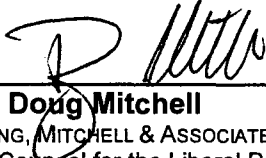
monies for illegitimate purposes and in the process broke faith with the Party.

- [18] Consequently, the Applicants submit that the basic principles of fairness require that the Liberal Party of Canada and the Liberal Party of Canada (Quebec) be granted full party standing, on an expedited basis, and be accorded funding, in accordance with Treasury Board guidelines, on the same basis as those accorded to other parties having received funding and full party standing.

The whole respectfully submitted.



Me Charles B. Côté
CÔTÉ PRIHODA
Co-Counsel for the Liberal Party of Canada
& the Liberal Party of Canada (Quebec)



Me Doug Mitchell
IRVING, MITCHELL & ASSOCIATES
Co-Counsel for the Liberal Party of Canada
& the Liberal Party of Canada (Quebec)

NOTICE OF PRESENTATION

To : THE COMMISSION OF INQUIRY INTO THE SPONSORSHIP PROGRAM AND ADVERTISING
ACTIVITIES

Me Sylvain Lussier

Me Gérald Tremblay

Me Michel Massicotte

Me John B. Laskin

Me John A. Terry

Me John Campion

Me Jean Lafleur

Me David Scott

Me Peter Doody

Me Pierre Fournier

Me Jean C. Hébert

Me Jean Montigny

Me George Hunter

Me Vincent Derose

Me Richard Dearden

Me Jean-Daniel Bélanger

Me Arthur Hamilton

Me Laurie Livingstone

Me Clément Groleau

Me Guy Pratte

Me Michael Edelson

Me Claude-Armand Sheppard

Me François Couture

Me Daniel Rochefort

Me François Grondin

Me George Pollack

Me Jean Sebastien Gallant

Me Kathy Duranleau
 Me Marc-André Fabien
 Me Marie Marmet
 Me Maxime Chevalier
 Me Émile Dupras
 Me Pierre V. Latraverse
 Me Raphaël H. Schachter
 Me Raymond Doray
 Me Maria Reit
 Me Richard Auger
 Me Stéphane Chatigny
 Me Tommy Tremblay
 Me Vincent Veilleux

TAKE NOTICE that you are being served with an Application on behalf of the LIBERAL PARTY OF CANADA and the LIBERAL PARTY OF CANADA (QUEBEC) for Full Party Standing before the Commission. The Application will be presented at Complexe Guy-Favreau, 200 René-Lévesque Boulevard West, Montreal, Quebec on April 4th, 2005 at 9:30 a.m. or at any other such time as the Commission may designate.

Signed this 3rd day of April 2005

CÔTÉ PRIHODA
 CÔTÉ PRIHODA

IRVING MITCHELL & ASSOCIATES
 IRVING, MITCHELL & ASSOCIATES

Attorneys for LIBERAL PARTY OF CANADA and LIBERAL PARTY OF CANADA (QUEBEC)