IN THE MATTER OF Part I of the Inquiries Act;

AND IN THE MATTER OF the Commission of Inquiry into Sponsorship Program and Advertising Activities;

AND IN THE MATTER OF the Rules of Procedure and Practice of the said Commission of Inquiry

NOTICE OF MOTION

TAKE NOTICE that pursuant to Rule 3 of the Rules of Procedure and Practice of the Commission of Inquiry, Mr. Ranald Quail shall apply for an Order granting him full standing for both Phase IA and Phase IB pursuant to the aforesaid Rules of Procedure and Practice, at the Commission's hearings in Ottawa on June 21 to 23, 2004 at such time and place as the Commission shall specify.

THIS MOTION is supported by the Affidavit of Mr. Ranald Quail, sworn, and oral submissions as permitted pursuant to Rule 4 of the Rules of Procedure and Practice of the Commission.

Dated at Ottawa this 25th day of May, 2004.

BORDEN LADNER GERVAIS LLP

Barristers and Solicitors 1100 – 100 Queen Street Ottawa, Ontario K1P 1J9

George D. Hunter (613) 787-3512 telephone (613) 230-8842 facsimile

Solicitors for Ranald Quail

LG-OTT-2\358144\1

IN THE MATTER OF Part I of the Inquiries Act;

AND IN THE MATTER OF the Commission of Inquiry into Sponsorship Program and Advertising Activities;

AND IN THE MATTER OF the Rules of Procedure and Practice of the said Commission of Inquiry

AFFIDAVIT OF RANALD QUAIL

I, RANALD QUAIL, of the City of Ottawa, Province of Ontario, retired federal civil servant, MAKE OATH AND SAY AS FOLLOWS:

- I served as the Deputy Minister, Public Works and Government Services Canada ("PWGSC"), between July, 1993 and April 1, 2001. I retired from the public service in the summer of 2003.
- 2. My residence address and other coordinates are as follows:

Address: 1266 Barnwell Crescent Navan ON K4B 1K4

Telephone: 613-835-1730

Email: rquail@rogers.com

- 3. I seek standing for both Phases 1A and 1B of the Inquiry.
- 4. As Deputy Minister of PWGSC during the material timeframe there is a possibility that I may be directly and substantially affected by findings of fact or recommendations made by the Inquiry.
- 5. Moreover, I believe that my perspective as Deputy Minister during the material timeframe will enhance the work of the Commission. Specifically, I believe that I have specific interests and/or a unique perspective on the following issues that would enhance the work of the Commission:

- (a) The creation, purpose and objectives of the Sponsorship Program;
- (b) The role and responsibility of non-elected public office holders within the Government of Canada;
- (c) Whether there was political influence involved in the Sponsorship Program;
- (d) Whether the procedures, structures, reporting lines, systems for approvals and internal controls which were implemented by the Government of Canada in the activities were sufficient, and if not, why not and to what purpose and effect.;
- (e) Whether there was compliance with the normally applicable rules, regulations, standards and guidelines, including the *Financial Administration Act*, and if not, the manner in which there was non-compliance;
- (f) Whether there was political influence on the distribution of funds; and
- (g) Whether there was sufficient external monitoring and financial controls with respect to the sponsorship, communications and advertising funds.
- 6. I am represented by the following lawyers:
 - (a) George D. Hunter
 Borden Ladner Gervais LLP
 Barristers and Solicitors
 1100 100 Queen Street
 Ottawa ON K1P 1J9

Telephone: 613-787-3512 Facsimile: 613-230-8842

Email: ghunter@blgcanada.com

2

 (b) Vincent DeRose Borden Ladner Gervais LLP Barristers and Solicitors 1100 – 100 Queen Street Ottawa ON K1P 1J9

> Telephone: 613-787-3589 Facsimile: 613-230-8842

Email: vderose@blgcanada.com

Jennifer Radford
 Borden Ladner Gervais LLP
 Barristers and Solicitors
 1100 – 100 Queen Street
 Ottawa ON K1P 1J9

Telephone: 613-787-3595 Facsimile: 613-230-8842

Email: jradford@blgcanada.com

7. I swear this Affidavit for the motion for Standing and for no other purpose.

)

SWORN BEFORE me at the City of Ottawa in the Province of Ontario this (9 day of May, 2004)

A Commissioner for Taking Affidavits, etc.

RANALD QUAIL

LG-OTT-2\358151\1