

COMMISSION OF INQUIRY INTO THE SPONSORSHIP PROGRAM AND
ADVERTISING ACTIVITIES

MOTION OF THE LIBERAL PARTY OF CANADA AND THE LIBERAL PARTY
OF CANADA (QUEBEC) TO HAVE WITNESSES HEARD BY THE
COMMISSIONER (*ARTICLE 29 RULES OF PRACTICE*)

Me Doug Mitchell

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ADVERTISING ACTIVITIES

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

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CANADA (QUEBEC) TO HAVE WITNESSES HEARD BY THE COMMISSIONER
(ARTICLE 29 RULES OF PRACTICE)*

- [1] The Applicants, Liberal Party of Canada and the Liberal Party of Canada (Quebec) (collectively "the Liberal Party") wish to have the Executive Directors of the Liberal Party, Mr. Steven Mackinnon and Me Hervé Rivet testify before the Commission.
- [2] The Applicants submit that the evidence that these two representatives would be relevant to the exercise of the Commission's mandate. In addition, they would present evidence that has not been adequately presented before the Commission to this date and which the Applicants believe will be of assistance to the Commissioner in drafting his report.
- [3] In particular, the evidence which Messieurs Mackinnon and Rivet would bring would cover the following:
- a) The structure and operations of the Applicants;
 - b) The relations between the Applicants;
 - c) The fundraising and reporting operations under the Canada Elections Act, as it existed during the period covered by the mandate of the Commission;
 - d) The structure of the Federal Liberal Agency of Canada and its operations;

- e) The changes to the Electoral Financing and reporting regime occasioned by the adoption of Bill C-24 and the steps taken by the Applicants to implement this process;
 - f) The measures put in place by the Applicants to ensure that the abuses and excesses identified in evidence before this Commission do not re-occur.
- [4] The Applicants expect that the presentation of this evidence would not extend beyond two hours.
- [5] The Applicants submit that such evidence is both useful and necessary to the accomplishment of the Commission's mandate.

The whole respectfully submitted.



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

AFFIDAVIT

I, the undersigned, **DOUG MITCHELL**, attorney and member of the firm Irving, Mitchell & Associates, maintaining our office at 4119, Sherbrooke Street West, in the city of Montreal, province of Quebec, H3Z 1A7, hereby make the following solemn declaration:

- 1) I am one of the attorneys representing the Liberal Party of Canada and the Liberal Party of Canada (Quebec) and make this affidavit in support of the Motion to Have Witnesses Heard by the Commissioner (*Article 29 Rules of Practice*);
- 2) All of the facts in the attached motion are true.

AND I HAVE SIGNED:



DOUG MITCHELL

SWORN BEFORE ME in the Province of Quebec,
this 16th day of May 2005



Commissioner of oaths for the district of Montreal

