



June 10, 2014

VIA EMAIL

Mr. Greg Essensa
Chief Electoral Officer
Elections Ontario
51 Rolark Drive
Toronto, ON M1R 3B1

Dear Mr. Essensa:

Re: Complaint regarding voter suppression attempts in London North Centre

As you know, we are legal counsel to the Ontario Liberal Party.

It has been brought to our attention that a registered voter and resident of London North Centre has received correspondence directing her to an erroneous polling location.

On June 9, 2014, Ms. Miriam Hamou of [REDACTED] received a letter via regular mail, which did not have a return address. A copy of this letter is attached for your reference. You will see that the letter purports to remind Ms. Hamou to vote. However, what is of serious concern is that the polling place to which Ms. Hamou is directed is inaccurate.

Ms. Hamou's proper poll location is Ryerson Public School, which is located at 940 Waterloo Street. The letter instructs Ms. Hamou to vote at Ridgeview Community Church, located at 1470 Glenora Drive. Ridgeview Community Church is located 4.3 km in the opposite direction from Ms. Hamou's proper poll location, Ryerson Public School. There is the very real risk that, if Ms. Hamou were to leave her home to vote just prior to the close of the polls on the 12th, she would miss her opportunity to vote by virtue of the fact that she was directed to the wrong poll location.

What is especially troubling about the letter sent to Ms. Hamou is its similarity to a letter authorized by the Bart Maves Campaign in the Niagara Falls by-election in February of this year. A copy of that letter is also attached for your reference. In that instance, a registered voter was directed to vote at the wrong location, nearly 7 km from the correct poll. At the time, a PC Party spokesman claimed there had been an "administrative error". Given the similarities between the Niagara Falls and London North Centre letters, we would certainly question whether this could be yet another administrative error, and are most concerned that this constitutes a deliberate attempt at voter suppression. In this regard, we note that this current misdirecting letter closely mirrors the one in Niagara Falls. One effort seems clearly modelled on the other, even to the point of wishing the recipient a good long weekend, something that was timely in the Niagara Falls campaign, but not in the current

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context. We further note that in both Niagara Falls, and in London North Centre, these misleading letters were sent to identified Liberal supporters with Liberal lawn signs.

In London North Centre we are so far aware of at least two homes that received these letters. These two homes had Liberal lawn signs. The letter sent to Ms. Hamou is from a Mr. Tim Gatten, who is listed as a Senior Constituency Assistant to Susan Truppe, Conservative Member of Parliament for London North Centre.

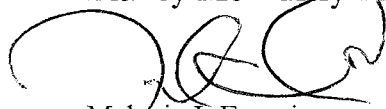
In light of the forgoing, first and foremost we ask that you take immediate measures to ensure that any misapprehension about voting locations created by these letters be rectified, and to ensure that voters in the area are directed to the correct poll location. The above tactics are eerily similar to the Guelph robocall issue, currently at trial. It is of the utmost importance that all voters have the opportunity to cast their ballot.

We further request that, following the election, you take appropriate measures to investigate this matter and to determine whether a violation of the *Elections Act* has occurred.

Thank you very much to your kind attention to this matter.

Yours very truly,

Blaney McMurtry LLP

A handwritten signature in black ink, appearing to read 'Melanie I. Francis', written over the printed name.

Melanie I. Francis
MIF/

Encl.

June 6, 2014

Dear Neighbour,

Now that summer is finally on the way after a long, harsh winter, our family can finally get outside and take advantage of the daylight lasting late into the evening.

It's been a busy start to the spring, and like you, my family and I are looking forward to a bit of a break. ~~Before we get too wrapped up in our summer vacations~~ though, I wanted to remind our friends and neighbours that this **Thursday June 12th is Election Day.**

This election my wife and I are planning on voting together ensuring our voice will be heard. I heard on TV that the results are expected to be close, and that means that each of our votes matter.

Our plan is to drive together to the **Ridgeview Community Church at 1470 Glenora Dr** for the opening of the polls at 9 a.m. I know that some of our neighbours are voting in the morning around the same time as we are, others are going to the polling station at lunchtime, while many will cast their ballot on the way home from work.

I hope that you have a wonderful long weekend and maybe we will bump into ~~each other at Ridgeview Community Church!~~

Sincerely,



Tim Gatten

Mariam Hamou
London, ON N5Y 3X3

1406070019
3802 MAL



February 6, 2014

[REDACTED]
Niagara Falls, ON [REDACTED]

Dear Patricia,

It's been a busy start to 2014 for my family – and I'm sure it's been for yours. And this weather has been challenging, to say the least!

I'm looking forward to the long weekend, looking forward to a bit of a break, and wanted to remind my friends and neighbours that by-election voting day is this Thursday February 13th just before the weekend.

This election my wife and I are planning on voting together and we're going to bring our kids so that they can see firsthand how voting works.

We discussed it, and our plan is to drive together to the Orchard Park School (7555 Montrose) for the opening of the polls at 9 a.m. and then head into work (I fully expect my wife will remind me to bring photo ID!)

It's a good idea to have a plan to vote in Thursday's by-election. I know that some of our neighbours are, for example, voting in the morning around the same time as we are, others are going to the polling station at lunchtime. Others are voting after they've had dinner.

I hope that you have a great long weekend and maybe we will bump into each other at Orchard Park School (7555 Montrose)!

Sincerely,



Doug Chipman

Orchard Park School
7555 Montrose, Niagara Falls
9:00am – 9:00pm

Authorized by the CFO for the Bart Maves Campaign