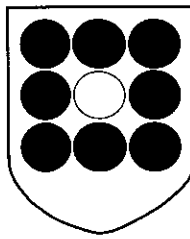


CANADIAN CIVIL LIBERTIES ASSOCIATION

360 Bloor Street West, Suite 506
Toronto, ON M5S 1X1
Telephone (416) 363-0321
FAX (416) 861-1291
E-mail: mail@ccla.org



ASSOCIATION CANADIENNE DES LIBERTÉS CIVILES

360 rue Bloor ouest, Bureau 506
Toronto, ON M5S 1X1
Téléphone (416) 363-0321
Télécopieur (416) 861-1291
Courriel : mail@ccla.org

October 18, 2010

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Mr. Arthur T. Porter, Chair
Security Intelligence Review Committee
P.O. Box 2430, Station "D"
Ottawa, Ontario K1P 5W5
Canada

Dear Mr. Porter:

On behalf of the Canadian Civil Liberties Association, I am writing to lodge a formal complaint under Section 41 of the *Canadian Security Intelligence Service Act* in relation to CSIS' conduct prior to and during the G8 and G20 Summits held in Toronto and Huntsville, Ontario. Security measures during these Summits resulted in significant violations of Canadians' constitutional liberties. Until the relevant government agencies are held accountable for their actions during the G8 and G20 Summits, lingering questions will remain that threaten to erode public confidence in Canada's policing and security intelligence services. The CCLA had 50 independent human rights monitors at the G20 Summit. Based on their observations, we published a preliminary report on G20 Summit security on June 29th, a copy of which is enclosed for your review.

Many activists have complained to the CCLA about being approached by state officials prior to the G8 and G20 Summits, voicing concerns that the government may have overstepped appropriate boundaries in pursuing pre-Summit intelligence at individuals' homes or places or work. Media reports have documented similar complaints, specifically singling out CSIS as the government agency believed to be using this type of intimidating intelligence gathering strategy. Concerns have also been raised that CSIS may have undertaken surveillance operations that involved the infiltration of certain protest groups for intelligence gathering purposes. The use of such tactics, especially in relation to non-violent political groups, raises troubling civil liberties concerns.

The CCLA believes that the Security Intelligence Review Committee has a vital role to play in ensuring accountability for CSIS' actions before and during the G8

Ottawa Office

160 Elgin Street, Suite 2600, Ottawa, ON K1P 1C3
Tel. (613) 233-1781 Fax (613) 563-9869

Bureau d'Ottawa

160 rue Elgin, Bureau 2600, Ottawa, ON K1P 1C3
Tél. (613) 233-1781 Téléc. (613) 563-9869



and G20 Summits. Accordingly, the CCLA requests that SIRC review CSIS' involvement in the collection of intelligence relating to the G8 and G20 Summits and the subsequent use of that information by the Service or other government agencies. This review should inquire into how many individuals or groups were approached or subject to surveillance and infiltration and whether those individuals or groups had any actual connection to criminal or injurious conduct. Particular attention should be given to CSIS' role in the surveillance of student groups from Québec and the extent to which such groups may have been unwarrantedly targeted for heightened scrutiny. Attention should also be given to the manner in which intelligence information was, or was not, communicated to other government agencies and whether this had any bearing on the decision not to deploy police officers to stop the vandalism that occurred on Saturday afternoon June 25th, 2010.

It would also be appropriate to review the policy framework governing CSIS' collection of intelligence information from protest groups and whether tactics currently employed by the Service are consistent with the *Charter of Rights and Freedoms*. In examining this question, particular attention should be given to the scope of activities that CSIS agents engage in while working undercover in protest groups and the extent to which the Service encourages demonstrators to use particular protest tactics.

A thorough investigation of CSIS' conduct in relation to the G8 and G20 Summits would help resolve outstanding questions about the Service's role in Summit security and ensure that public confidence in CSIS not undermined. Accordingly, the Canadian Civil Liberties Association calls upon SIRC to treat this letter as an official complaint and to provide for the investigation of this matter at the earliest opportunity.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Des Rosiers', with a long horizontal flourish extending to the right.

Nathalie Des Rosiers
General Counsel