



Public Inquiry Into Foreign Interference in Federal
Electoral Processes and Democratic Institutions

Enquête publique sur l'ingérence étrangère dans les
processus électoraux et les institutions démocratiques
fédéraux

Public Hearing

Audience publique

**Commissioner / Commissaire
The Honourable / L'honorable
Marie-Josée Hogue**

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III

Appearances / Comparutions

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Ukrainian Canadian Congress	Donald Bayne Jon Doody
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Office of the Commissioner of Canada Elections	Christina Maheux Luc Boucher Nancy Miles
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Russian Canadian Democratic Alliance	Mark Power Guillaume Sirois
Michael Chan	John Chapman Andy Chan
Han Dong	Mark Polley Emily Young Jeffrey Wang
Michael Chong	Gib van Ert Fraser Harland
Jenny Kwan	Sujit Choudhry Mani Kakkar

IV Appearances / Comparutions

Churchill Society

Malliha Wilson

The Pillar Society

Daniel Stanton

Democracy Watch

Wade Poziomka
Nick Papageorge

Canada's NDP

Lucy Watson

Conservative Party of Canada

Nando de Luca

Chinese Canadian Concern Group on
The Chinese Communist Party's
Human Rights Violations

Neil Chantler

Erin O'Toole

Thomas W. Jarmyn
Preston Lim

Senator Yuen Pau Woo

Yuen Pau Woo

V
Table of Content / Table des matières

	PAGE
Preliminary Matters by/Matières préliminaires par Ms. Erin Dann	1
Preliminary Matters by/Matières préliminaires par Ms. Kate McGrann	5
MR. AZAM ISHMAEL, Sworn/Assermenté	6
MS. ANNE McGRATH, Sworn/Assermentée	6
MR. WALIED SOLIMAN, Sworn/Assermenté	6
Examination in-Chief by/Interrogatoire en-chef par Ms. Kate McGrann	7
Cross-Examination by/Contre-interrogatoire par Mr. Thomas Jarmyn	57
Cross-Examination by/Contre-interrogatoire par Mr. Fraser Harland	62
Cross-Examination by/Contre-interrogatoire par Mr. Sujit Choudhry	69
Cross-Examination by/Contre-interrogatoire par Mr. Nando De Luca	74
Cross-Examination by/Contre-interrogatoire par Mr. Prabjot Singh	79
Cross-Examination by/Contre-interrogatoire par Me Guillaume Sirois	87
Cross-Examination by/Contre-interrogatoire par Ms. Sarah Teich	91
Cross-Examination by/Contre-interrogatoire par Mr. Gregory Tzemenakis	96
Cross-Examination by/Contre-interrogatoire par Ms. Laura Dougan	99
MR. HAN DONG, Sworn/Assermenté	102
Examination in-Chief by/Interrogatoire en-chef par Mr. Howard Krongold	102
Cross-Examination by/Contre-interrogatoire par Mr. Gib van Ert	136
Cross-Examination by/Contre-interrogatoire par Mr. Nando de Luca	148
Cross-Examination by/Contre-interrogatoire par Ms. Sarah Teich	159
Cross-Examination by/Contre-interrogatoire par Mr. Mark Polley	161

VI
Table of Content / Table des matières

	PAGE
MR. TED LOJKO, Sworn/Assermenté	168
Examination in-Chief by/Interrogatoire en-chef par Mr. Howard Krongold	168
Cross-Examination by/Contre-interrogatoire par Mr. Nando de Luca	185
Cross-Examination by/Contre-interrogatoire par Ms. Sarah Teich	191
MR. MICHAEL CHAN, Affirmed/Sous affirmation solennelle	196
Examination in-Chief by/Interrogatoire en-chef par Mr. Howard Krongold	196
Cross-Examination by/Contre-interrogatoire par Mr. Gib van Ert	211
Cross-Examination by/Contre-interrogatoire par Mr. Nando de Luca	215
Cross-Examination by/Contre-interrogatoire par Ms. Sarah Teich	223
Cross-Examination by/Contre-interrogatoire par Mr. John Chapman	227

VII
Exhibit List / Liste des pièces

No.	DESCRIPTION	PAGE
WIT 32_EN	Interview Summary: Azam Ishmael	5
WIT 32_FR	Résumé d'entrevue : Azam Ishmael	5
WIT 22_EN	Interview Summary: Walied Soliman	8
WIT 22_FR	Résumé d'entrevue : Walied Soliman	8
WIT 23_EN	Interview Summary: Anne McGrath	10
WIT 23_FR	Résumé d'entrevue : Anne McGrath	10
CAN 2323	Classified Briefing to Political Parties: CSIS Mandate and Threat Landscape	18
CAN 18041	SITE TF Briefing to Secret Cleared Federal Political Parties	31
CAN 13124	CPC Concerns around Foreign Election Interference 2021	38
COM 104	First Report - Independent Special Rapporteur on Foreign Interference	68
CAN.DOC 13	Institutional Report - Prime Minister's Office	75
RCD 9	Tweet by Walied Soliman - 17 February 2023	87
WIT 10_EN	Statement of Anticipated Evidence: Han Dong	103
WIT 10_FR	Déclaration de preuve anticipée : Han Dong	103
HDD 6	Supplementary Information to Statement of Anticipated Evidence of Han Dong	103
CAN 4728	Foreign Interference in the 2019 Federal Campaign of Dong Han - CNSB 23/19	120
CAN.SUM 1	Topical Summary: Don Valley North Liberal Party Nomination Race in 2019	125

VIII
Exhibit List / Liste des pièces

No.	DESCRIPTION	PAGE
CAN.SUM 2	Topical Summary: Intelligence Relating to Han Dong and Communication with PRC Officials Regarding the “Two Michaels”	136
WIT 21.EN	Interview Summary: Ted Lojko	191
WIT 21.FR	Résumé d’entrevue : Ted Lojko	191
WIT 17.EN	Interview Summary: Michael Chan	196
WIT 17.FR	Résumé d’entrevue : Michael Chan	196
COM 67	Article: CSIS warned Trudeau about Toronto-area politician's alleged ties to Chinese diplomats [The Globe and Mail]	211
COM 101	Article: Hong Kong Canadians question alleged pro-Beijing backing for prominent Liberal candidate [Global]	219

Ottawa, Ontario

--- Upon commencing on Monday, April 2, 2024 at 9:53 a.m.

L'audience débute le mardi 2 avril, 2024 à 9 h 53

THE REGISTRAR: Order, please. Ordre s'il vous plaît.

This sitting of the Foreign Interference Commission is now in session. Commissioner Hogue is presiding. Cette séance de la Commission sur l'ingérence étrangère est maintenant en cours. La Commissaire Hogue préside. The time is 9:53 a.m. Il est 9 h 53.

COMMISSIONER HOGUE: Good morning. So again, I apologise for our delay. It's always the same thing, there is some technical issue that needs to be resolved. But we are ready. I think Me McGrann has certain rules to recall.

--- PRELIMINARY MATTERS BY/MATIÈRES PRÉLIMINAIRES PAR

MS. ERIN DANN:

MS. ERIN DANN: Good morning. Thank you, Commissioner. It's Erin Dann, Commission Counsel. And just before we begin the evidence today, the Commission wish to make the following announcement about the production of topical summaries.

The Government of Canada has produced to the Commission a number of unclassified topical summaries of Government of Canada intelligence holdings that will be introduced as evidence over the course of the Commission's proceedings.

The Government of Canada has appended the following explanation to each of these documents: This

1 document is an unclassified summary of intelligence held by
2 Security and Intelligence departments and agencies. It has
3 primarily been created by CSIS, with input and agreement from
4 CSE, GAC, PCO, RCMP and PS. It responds to a specific
5 request by the Commission for the Public Inquiry into Foreign
6 Interference in Federal Electoral Processes and Democratic
7 Institutions, for an unclassified summary of information
8 regarding this particular topic and should not be used as the
9 basis of understanding for any other topic.

10 This document is based on intelligence
11 collected and assessed over a period of time and does not
12 necessarily reflect the Government of Canada's full
13 understanding of the topic at any specific point in time.
14 The underlying intelligence has been provided to the
15 Commission.

16 By employing summaries and redactions, this
17 document sanitizes intelligence in a manner that removes the
18 potential injury to national security and international
19 relations, does not disclose sensitive activities,
20 techniques, methods, and sources of intelligence that would
21 cause potential injury, and abides by relevant Canadian
22 legislation. It does not provide all of the caveats and
23 limitations contained in the original classified documents or
24 provide an assessment of the reliability or credibility of
25 any specific intelligence, as it would disclose information
26 that would cause injury, or as it could disclose information
27 that would cause injury.

28 This is a summary of some intelligence

1 information that is available to the Government of Canada's
2 national security and intelligence community on a certain
3 topic, presented such that it can be released to the public
4 without disclosing information that would cause injury to
5 national security and international relations. As such, it
6 has several important limitations. The summary must be read
7 in light of these limitations, otherwise the summary has the
8 potential to mislead the reader. The limitations are the
9 following:

10 Summary may be incomplete: The summary
11 summarises some, but not necessarily all, the intelligence
12 information on this topic that is available to the Government
13 of Canada's national security and intelligence community.
14 For example, it only contains relevant information that can
15 be appropriately sanitised for public release.

16 Summary does not indicate time of collection:
17 This summary does not indicate, unless expressly stated, when
18 the summarised information was collected or obtained. This
19 information was collected and analysed over a period of time,
20 which may or may not have been available to decisionmakers
21 across the Government of Canada during the writ-period. As
22 such, for example, it should not be assumed that the
23 information was collected close in time to the events being
24 described.

25 Summary may contain information that is
26 single-sourced: The summary does not indicate whether the
27 information it relates to comes from a single source, or from
28 multiple sources.

1 Summary may contain information of unknown
2 and varying degrees of reliability, or information that may
3 have been provided to influence as much as inform.

4 Summary does not indicate the source of
5 information: The summary may present information from
6 different sources -- from different types of sources without
7 identifying the type of source, i.e. open source, human
8 sources, technical intercepts, et cetera. Nor, does it
9 indicate whether it was translated from another language than
10 the language in which it was -- it is presented.

11 Summary does not indicate corroboration or
12 lack of corroboration: The summary does not indicate whether
13 other information exists that may corroborate the summarised
14 information, or, alternatively, whether there is no such
15 corroborating information.

16 Summary does not analyse information: This
17 document is a summary of intelligence; it is not an analysis
18 of the overall import, meaning, or strength of intelligence.

19 The Commission has been provided with all
20 relevant intelligence and assessments, which indicates
21 information on reliability and corroboration of the
22 information contained therein.

23 Next, I will address the use of topical
24 summaries in the public hearings.

25 Subject to the Rules and the Commissioner's
26 discretion to direct the hearings in accordance with the
27 Guiding Principles, counsel may refer to the topical
28 summaries in cross-examination. In doing so, counsel must

1 frame their questions in a way that makes it clear to the
2 witness that the information in the topical summaries
3 reflects a summary produced by the Government of Canada of
4 certain information in its intelligence holdings, not proven
5 facts.

6 Thank you, Commissioner.

7 **COMMISSIONER HOGUE:** Thank you.

8 **--- PRELIMINARY MATTERS BY/MATIÈRES PRÉLIMINAIRES PAR**

9 **MS. KATE McGRANN:**

10 **MS. KATE McGRANN:** Good morning.

11 **COMMISSIONER HOGUE:** Good morning.

12 **MS. KATE McGRANN:** My name is Kate McGrann.

13 I'm Commission Counsel, and will begin this morning with some
14 preliminary matters. We'll start by asking the Court
15 Operator to pull up WIT 32_EN. For the purpose of the record
16 only, the French version of this summary is found at
17 WIT 32_FR.

18 **--- EXHIBIT No./PIÈCE No. WIT 32 EN:**

19 Interview Summary: Azam Ishmael

20 **--- EXHIBIT No./PIÈCE No. WIT 32 FR:**

21 Résumé d'entrevue : Azam Ishmael

22 **MS. ERIN DANN:** Ms. McGrann, we just need to
23 ensure the witnesses are sworn or affirmed.

24 **MS. KATE McGRANN:** Thank you.

25 **THE REGISTRAR:** We'll start with you,
26 Mr. Ishmael. Do you request to be sworn on -- sworn or
27 affirmed?

28 **MR. AZAM ISHMAEL:** Sworn is fine.

1 **THE REGISTRAR:** Okay. Please state your name
2 and your full name and spell out your last name for the
3 record, please.

4 **MR. AZAM ISHMAEL:** Azam Louis Ishmael is my
5 full name. Ishmael is spelled I-S-H-M-A-E-L.

6 **--- MR. AZAM ISHMAEL, Sworn/Assertmenté:**

7 **THE REGISTRAR:** Thank you.

8 And Ms. McGrath, would you like to be
9 affirmed or sworn?

10 **MS. ANNE McGRATH:** Sworn is fine for me.

11 **THE REGISTRAR:** Okay. Please state your name
12 and your last name and spell your last name for the record,
13 please.

14 **MS. ANNE McGRATH:** Okay. It's Geraldine Anne
15 McGrath. And it's M-C-G-R-A-T-H.

16 **--- MS. ANNE McGRATH, Sworn/Assertmentée:**

17 **THE REGISTRAR:** Thank you.

18 Counsel may proceed.

19 **MS. KATE McGRANN:** We have a third witness
20 who is joining us via Zoom.

21 **THE REGISTRAR:** Mr. Soliman, do you wish to
22 be affirmed or sworn?

23 **MR. WALIED SOLIMAN:** Sworn is fine.

24 **THE REGISTRAR:** Okay. Please state your name
25 and spell your name for the record.

26 **MR. WALIED SOLIMAN:** Walied Soliman. S-O-L-
27 I-M-A-N.

28 **--- MR. WALIED SOLIMAN, Sworn/Assertmenté:**

1 THE REGISTRAR: Thank you very much.

2 --- EXAMINATION IN-CHIEF BY/INTERROGATOIRE EN-CHEF PAR

3 MS. KATE McGRANN:

4 MS. KATE McGRANN: I'll ask the Court
5 Operator to pull up WIT 32_EN. We're looking at a Stage 1
6 Interview Summary of Azam Ishmael.

7 Mr. Ishmael, you were interviewed by
8 Commission counsel on March 5th, 2024. Do you remember that
9 interview?

10 MR. AZAM ISHMAEL: Yes.

11 MS. KATE McGRANN: A summary was prepared of
12 that interview, which is being shown to you now. Have you
13 had an opportunity to review this summary?

14 MR. AZAM ISHMAEL: Yes.

15 MS. KATE McGRANN: Will you agree that this
16 document is an accurate summary of the interview you provided
17 to Commission counsel?

18 MR. AZAM ISHMAEL: Yes.

19 MS. KATE McGRANN: Do you adopt this
20 interview summary as part of your evidence before the
21 Commission?

22 MR. AZAM ISHMAEL: Yes.

23 MS. KATE McGRANN: Mr. Ishmael, you served as
24 the National Director of the Liberal Party and you've sat in
25 that role since 2017?

26 MR. AZAM ISHMAEL: Correct.

27 MS. KATE McGRANN: And you continue to serve
28 in that role today?

1 **MR. AZAM ISHMAEL:** Yes.

2 **MS. KATE McGRANN:** You also served as the
3 Liberal Party's National Campaign Director for the 2021
4 Federal Election?

5 **MR. AZAM ISHMAEL:** Correct.

6 **MS. KATE McGRANN:** You were one of the
7 Liberal Party representatives designated to receive briefings
8 from the Security and Intelligence Threats to Election
9 Taskforce in respect of the 2019 election?

10 **MR. AZAM ISHMAEL:** Yes.

11 **MS. KATE McGRANN:** For the remainder of our
12 discussion today, I'll be referring to the Security and
13 Intelligence Threats to Election Taskforce as the SITE
14 Taskforce.

15 And, Mr. Ishmael, you were also one of the
16 Liberal Party representatives designated to receive briefings
17 from the SITE Taskforce in respect of the 2021 election?

18 **MR. AZAM ISHMAEL:** Yes.

19 **MS. KATE McGRANN:** You can take that document
20 down. And I'll ask that we turn up WIT 22_EN.

21 Once again, for the record only, the French
22 version of this summary is found at WIT 22_FR.

23 **--- EXHIBIT No./PIÈCE No. WIT 22 EN:**

24 Interview Summary: Walied Soliman

25 **--- EXHIBIT No./PIÈCE No. WIT 22 FR:**

26 Résumé d'entrevue : Walied Soliman

27 **MS. KATE McGRANN:** We're looking at an
28 interview summary of Walied Soliman.

1 Mr. Soliman, you were interviewed by
2 Commission counsel on March 7th, 2024. Do you remember that
3 interview?

4 **MR. WALIED SOLIMAN:** Yes.

5 **MS. KATE McGRANN:** A summary was prepared of
6 that interview, which is being shown to you now. Have you
7 had an opportunity to review this summary?

8 **MR. WALIED SOLIMAN:** Yes.

9 **MS. KATE McGRANN:** Will you agree that this
10 document is an accurate summary of the interview you provided
11 to Commission counsel?

12 **MR. WALIED SOLIMAN:** Yes.

13 **MS. KATE McGRANN:** Do you adopt this
14 interview summary as part of your evidence before the
15 Commission?

16 **MR. WALIED SOLIMAN:** Yes.

17 **MS. KATE McGRANN:** You are the Canadian Chair
18 of the law firm Norton Rose Fulbright?

19 **MR. WALIED SOLIMAN:** Yes.

20 **MS. KATE McGRANN:** You did not play a role in
21 the Conservative Party of Canada's campaign in the 2019
22 General Election?

23 **MR. WALIED SOLIMAN:** Correct.

24 **MS. KATE McGRANN:** You served as a co-chair
25 of the Conservative Party's General Election Campaign for the
26 2021 General Election?

27 **MR. WALIED SOLIMAN:** Correct.

28 **MS. KATE McGRANN:** You were the Conservative

1 Party representative designated to receive briefings from the
2 SITE Taskforce for the 2021 General Election?

3 **MR. WALIED SOLIMAN:** Correct.

4 **MS. KATE McGRANN:** Can we please turn up WIT
5 23_EN?

6 Once again, for the record only, the French
7 version of this summary is found at WIT 23_FR.

8 **--- EXHIBIT No./PIÈCE No. WIT 23 EN:**

9 Interview Summary: Anne McGrath

10 **--- EXHIBIT No./PIÈCE No. WIT 23 FR:**

11 Résumé d'entrevue : Anne McGrath

12 **MS. KATE McGRANN:** We're looking at an
13 interview summary for Anne McGrath.

14 Ms. McGrath, you were interviewed by
15 Commission counsel on February 20th, 2024. Do you remember
16 that interview?

17 **MS. ANNE McGRATH:** Yes, I do.

18 **MS. KATE McGRANN:** A summary was prepared of
19 that interview, which is being shown to you now. Have you
20 had an opportunity to review this summary?

21 **MS. ANNE McGRATH:** I have.

22 **MS. KATE McGRANN:** Will you agree that this
23 document is an accurate summary of the interview you provided
24 to Commission counsel?

25 **MS. ANNE McGRATH:** Yes.

26 **MS. KATE McGRANN:** Do you adopt this
27 interview summary as part of your evidence before the
28 Commission?

1 **MS. ANNE McGRATH:** Yes.

2 **MS. KATE McGRANN:** You served as the National
3 Director of the NDP from shortly after the Alberta Provincial
4 Election in April of 2019 until January 2024?

5 **MS. ANNE McGRATH:** That's correct.

6 **MS. KATE McGRANN:** You were the NDP's
7 representative designated to receive briefings from the SITE
8 Taskforce for the 2021 General Election?

9 **MS. ANNE McGRATH:** Yes.

10 **MS. KATE McGRANN:** Thank you.

11 And we can take that document down.

12 In each of your roles as representatives
13 designated to receive briefings from the SITE Taskforce, you
14 each obtained security, secret security clearances, and
15 subsequently received secret classified briefings as a group.

16 Those briefings and that experience are the
17 focus of my questions for today's panel.

18 Some of you may also have received classified
19 briefings delivered to you on an individual basis or
20 delivered to your parties on an individual basis in respect
21 of the parties that you represented. I will not be asking
22 you about those briefings.

23 The Government has produced copies of
24 documents relating to the briefings from the SITE Taskforce
25 in a format suitable for public disclosure. We will be
26 reviewing some of those documents together today.

27 There is information in those documents that
28 has been redacted. In accordance with the Commission's

1 obligations to protect classified information, I will not ask
2 you questions intended to elicit classified information you
3 received.

4 And I understand that you may not be able to
5 answer aspects of the questions that I ask you. Where that
6 is the case, please simply indicate where you cannot answer
7 these questions in a public setting, and I will move on.

8 Before we turn to your experiences as
9 designated representatives of your respective parties to the
10 SITE Taskforce, I want to touch briefly on the topic of the
11 campaign party nomination process.

12 I'll begin with some questions for you, Mr.
13 Ishmael.

14 I understand that Liberal Party
15 representatives received a classified briefing in respect of
16 the nomination contest in Don Valley North and that you are
17 not in a position today to provide any information about
18 that.

19 Commissioner, we expect that other witnesses
20 called at the public hearings will be able to speak to this
21 briefing.

22 Mr. Ishmael, are you aware of media reports
23 starting in early 2023 alleging that there were
24 irregularities in the 2019 Liberal Party nomination contest
25 in the riding of Don Valley North, that international
26 students with falsified documents were bussed to campaign
27 voting sites and coerced into voting for Han Dong?

28 **MR. AZAM ISHMAEL:** I'm aware of the media

1 reports, yes.

2 **MS. KATE McGRANN:** I understand that from the
3 Liberal Party's perspective, there were no issues or
4 irregularities in the Don Valley North nomination process?

5 **MR. AZAM ISHMAEL:** Correct.

6 **MS. KATE McGRANN:** Could you please explain
7 why the Liberal Party holds that view?

8 **MR. AZAM ISHMAEL:** So the Liberal Party of
9 Canada operates, I think much like the other political
10 parties, a very rigorous process around nomination meetings,
11 including a set of published rules, as well as the basis in
12 our Constitution that are reviewed and approved by the
13 National Board of Directors.

14 The process, as intended, is meant to be both
15 transparent and detail oriented, as you can -- as witnessed
16 by the actual rules themselves.

17 And the Chair of the meeting has not -- the
18 Chair of the meeting for that particular nomination meeting
19 has not indicated any irregularity, nor did any of the
20 participants in a meeting avail themselves of the appeals
21 process that is available to anybody who is a party to the
22 nomination meeting.

23 **MS. KATE McGRANN:** I'm going to take this
24 opportunity to remind myself, as much as you, that we have to
25 endeavour to slow down when we're speaking, because there is
26 translation taking place. So I'm going to try to remember
27 that as we move forward.

28 Mr. Ishmael, you are aware that the

1 Commission has received a Supplemental Statement of
2 Anticipated Evidence from Mr. Dong?

3 **MR. AZAM ISHMAEL:** Yes.

4 **MS. KATE McGRANN:** That Statement of
5 Anticipated Evidence says that Mr. Dong recalls that
6 international students attending a private high school and
7 living in a residence at Seneca College voted in the 2019 Don
8 Valley North Nomination?

9 **MR. AZAM ISHMAEL:** Yes, that's what it says.
10 Yeah.

11 **MS. KATE McGRANN:** That Statement of
12 Anticipated Evidence also says that Mr. Dong recalls being
13 told that a bus organized by the school had transported some
14 of the students to the nomination meeting?

15 **MR. AZAM ISHMAEL:** Yes.

16 **MS. KATE McGRANN:** Assuming, for the sake of
17 this question, that Mr. Dong confirms this information as his
18 evidence, would that change your views about whether there
19 were any issues or irregularities with the 2019 Don Valley
20 North Nomination Race?

21 **MS. AZAM ISHMAEL:** No. People who are -- who
22 ordinarily reside within the riding are allowed to vote in
23 our nomination meetings. The only thing that catches me as a
24 bit peculiar there is organized by the school, given that it
25 was a partisan political event.

26 **MS. KATE McGRANN:** Stepping back now from the
27 2019 nomination race in the Don Valley North Riding, and
28 looking more generally at the Liberal Party's rules governing

1 who can vote in nomination races, which you've spoken to
2 briefly already, do you have a view on whether the nomination
3 process is vulnerable to foreign interference?

4 **MR. AZAM ISHMAEL:** Yes, I have a view, and I
5 don't particularly believe that it is vulnerable to foreign
6 interference.

7 **MS. KATE McGRANN:** Explain the basis for your
8 view, please.

9 **MR. AZAM ISHMAEL:** So the process for
10 identification of electors in a nomination meeting closely
11 mirror the requirements from Elections Canada, with the
12 exception -- notable exceptions of people who are of the age
13 of 14 who are allowed to vote and participate in the
14 nomination meeting, as well as people are allowed to be
15 vouched for at the nomination meeting.

16 So, you know, beyond that you need to prove
17 -- you have to prove your place of residence, provide either
18 two pieces of ID, one bearing your address, or with a photo
19 ID, very similar to the Elections Canada process.

20 **MS. KATE McGRANN:** Mr. Soliman, do you have a
21 view on whether the political party nomination races are
22 vulnerable to foreign interference?

23 **MR. WALIED SOLIMAN:** I don't know the answer
24 to that. I think that it's -- that's a question for our
25 security establishment.

26 **MS. KATE McGRANN:** Ms. McGrath, do you have a
27 view on whether NDP nomination races are vulnerable to
28 foreign interference?

1 **MS. ANNE McGRATH:** I would agree that there's
2 no basis to judge that. I believe that foreign actors may be
3 interested, but I have no evidence of any involvement.

4 **MS. KATE McGRANN:** We'll now shift our focus
5 to your experiences as designated representatives for your
6 respective parties to the SITE Task Force.

7 And I'll begin with some questions about your
8 interactions, Mr. Ishmael, with the SITE Task Force in
9 respect of the 2019 general election.

10 But before I do that, Ms. McGrath, would you
11 please describe the party's awareness of foreign interference
12 as a potential issue before SITE Task Force briefings began
13 in respect of the 2019 general election?

14 **MS. ANNE McGRATH:** I would say it was not
15 high on the radar. Most of the information that we've ever
16 received about this has been through media reports ---

17 **MS. KATE McGRANN:** Mr. Ishmael ---

18 **MS. ANNE McGRATH:** --- after the fact.

19 **MS. KATE McGRANN:** Oh, pardon me.

20 **MS. ANNE McGRATH:** Sorry. After the fact.

21 **MS. KATE McGRANN:** Thank you for that
22 clarification.

23 Mr. Ishmael, could you please describe the
24 Liberal Party's awareness of foreign interference as a
25 potential issue before the SITE Task Force briefings began in
26 respect of the 2019 general election?

27 **MR. AZAM ISHMAEL:** We were largely aware,
28 through the media reports, of potential foreign interference

1 as witnessed by the -- or during the American election in
2 2016 in regards to cyber attacks on the democratic candidate.

3 **MS. KATE McGRANN:** And staying with you for
4 the time being, Mr. Ishmael, would you please describe your
5 experience as a designated Liberal Party representative to
6 the SITE Task Force in advance of the 2019 general election?

7 **MR. AZAM ISHMAEL:** Describe the experience.
8 You know, generally speaking, it was an interesting
9 experience in which they shared some information. In some
10 regards it was a bit disappointing in the recommendations
11 that would -- or lack thereof, the recommendations they would
12 make.

13 But generally, as you would expect from a
14 public institution in Canada, it was very professional, well-
15 run, and thoughtful.

16 **MS. KATE McGRANN:** You said that aspects of
17 the experience were disappointing. Please explain what you
18 mean by that.

19 **MR. AZAM ISHMAEL:** Often times, without
20 disclosing any of the briefing itself, you know, as a general
21 request, political parties had asked for assistance on
22 procuring technology that would have been approved or, you
23 know, endorsed by the Government of Canada to know that, you
24 know, if you use this -- if you use this type of technology
25 it would be the gold standard. And often it was very
26 reluctant to provide any recommendation in regards to that.
27 Although it did provide general information around
28 cybersecurity and how to protect; you know, kind of

1 cybersecurity 101, basically.

2 **MS. KATE McGRANN:** Other than the matter
3 related to technology recommendations, were there any other
4 elements of your experience with the SITE Task Force in 2019
5 that you found disappointing?

6 **MR. AZAM ISHMAEL:** No.

7 **MS. KATE McGRANN:** I ask that we turn up CAN
8 2323.

9 --- EXHIBIT No./PIÈCE No. CAN 2323:

10 Classified Briefing to Political
11 Parties: CSIS Mandate and Threat
12 Landscape

13 **MS. KATE McGRANN:** This is a document titled,
14 "Classified Briefing to Political Parties: CSIS Mandate &
15 Threat Landscape." Would you please turn to page 2 of this
16 document? If you look at ---

17 **MR. WALIED SOLIMAN:** I'm not seeing it on my
18 screen, by the way, counsellor.

19 **MS. KATE McGRANN:** Please bear with us for
20 one second.

21 **MR. WALIED SOLIMAN:** I can see it now.

22 **MS. KATE McGRANN:** Thanks very much.

23 Turning back to the document that's on the
24 screen that's now in front of all of you, if you look at the
25 top of the page you'll see a heading, "Threat Overview,
26 Election 2019: Trends," and we see four trends identified
27 here. I'll give you a second to read the four bullet points
28 that are before you, and you'll see that they speak to the

1 current threat landscape in Canada.

2 (SHORT PAUSE/COURTE PAUSE)

3 MS. KATE McGRANN: Mr. Ishmael, is this
4 consistent with the nature of the information you recall
5 receiving at the SITE Task Force briefings you attended?

6 MR. AZAM ISHMAEL: Yes.

7 MS. KATE McGRANN: Was information of this
8 nature useful to your party?

9 MR. AZAM ISHMAEL: It was useful in that it
10 helped position how many resources we would deploy to kind of
11 counter the threats, notably the cyber threat activity, given
12 the activities in the US. But I would say it was helpful to
13 help position ourselves.

14 MS. KATE McGRANN: The next section of this
15 document is titled, "What is FI and who are the Threat
16 Actors." And I'll note that in the section above, FI was
17 defined as foreign interference. What follows is a high-
18 level description of foreign interference, who engages in it,
19 and why. I'd like to look at a couple of examples with you.

20 If we could turn to page 4 of this document?
21 With respect to the threat of foreign interference in the
22 2019 general election, the first bullet point on this page
23 reads:

24 "State-sponsored cyber information
25 operations against democratic
26 institutions are on the rise globally
27 and will continue to impact
28 democratic institutions worldwide."

1 I'll turn your attention now to the third
2 bullet point, which states:

3 "While Canada is not immune to this
4 threat, we are not aware of any
5 significant cyber threat to Canadian
6 elections posed by state actors at
7 this time. Furthermore, we have no
8 information to indicate that nonstate
9 actors are actively conducting, or
10 plan to conduct, cyber-based
11 influence operations."

12 The last bullet point in this section states:

13 "We are almost certainly not aware of
14 the full extent of the F1 [for
15 foreign interference] activities of
16 hostile states in Canada."

17 Now, I appreciate that you cannot tell us
18 about any classified information that you received, but are
19 you able to tell us whether this briefing and the examples
20 that I have taken you to are consistent with the nature of
21 the information you recall receiving at the SITE Task Force
22 briefings you attended?

23 **MR. AZAM ISHMAEL:** Yes.

24 **MS. KATE McGRANN:** Was information of this
25 nature useful to your party?

26 **MR. AZAM ISHMAEL:** Yes.

27 **MS. KATE McGRANN:** Would you please explain
28 why?

1 uses Chinese Canadian community
2 groups, social media tools, trusted
3 contacts, co-optees and cutouts
4 (business people, Canadian permanent
5 residents and citizens), staff
6 members of elected officials and
7 China media language outlets to
8 advance Communist Party of China
9 objectives." (As read)

10 We'll look at one other example. If we can
11 turn to page 5, please.

12 I'm going to draw your attention to the third
13 bullet point on this page, which reads:

14 "Elected officials and candidates
15 across all levels of government
16 targeted. China covertly directs
17 financial and voting support for
18 favourable candidates, parties and
19 policies perceived to further China's
20 strategic interests." (As read)

21 This memo, I note also, has sections on
22 India, Pakistan and Iran.

23 Speaking only in generalities, are you able
24 to tell us whether this information is consistent with the
25 nature of the information you recall receiving at the SITE
26 Task Force briefings you attended?

27 **MR. AZAM ISHMAEL:** Yes.

28 **MS. KATE McGRANN:** Was information of this

1 nature useful to your Party?

2 **MR. AZAM ISHMAEL:** It was interesting to
3 know, but very difficult to action, so not overly useful in
4 terms of implementing.

5 **MS. KATE McGRANN:** Please explain why you say
6 that information of this nature was difficult to action?

7 **MR. AZAM ISHMAEL:** Well, I think the first
8 bullet point says it being done both covertly and with
9 impunity, so hard to, obviously, detect something that is
10 covert in nature as well as, you know, a lot of the
11 allegations here I would think were matters for law
12 enforcement, security agencies to action if ever they
13 witnessed or saw something that would be inappropriate in any
14 nature.

15 You know, the Canadian process itself is
16 actually quite rigorous between the oversight of Elections
17 Canada and the Commissioner of Elections Canada, so we have a
18 lot of trust that Elections Canada and the Commissioner of
19 Elections Canada will investigate threats as needed.

20 You pointed to the description in this
21 document of the covert nature and the fact that actors feel
22 they can act with impunity. Any other reasons why
23 information of this nature was difficult for your Party to
24 action?

25 **MR. AZAM ISHMAEL:** It's very general as a
26 statement.

27 **MS. KATE McGRANN:** We'll turn our focus now
28 to after the 2019 General Election was over.

1 Would you please describe your experience as
2 a designated Party representative to the SITE Task Force
3 following the 2019 General Election?

4 **MR. AZAM ISHMAEL:** In reflection of the 2019
5 or just like a general observation of 2019?

6 So in -- you know, I thought the SITE Task
7 Force was a good effort by the government to safeguard the
8 elections. I did really appreciate understanding and knowing
9 that a number of senior bureaucratic officials were
10 monitoring the situation actively which, from my
11 understanding, was the first time in Canadian history that it
12 had been done. And should they have seen anything, they
13 would have reported it duly to -- you know, to the media or
14 taken the necessary steps.

15 So I think from that perspective, it was
16 quite interesting and I applaud the government's action on
17 that regard.

18 In regards to the information that was passed
19 on to us, you know, it's -- as you can see with disclosing
20 anything that we were briefed on, the nature of the
21 information that we were given was very general and, you
22 know, very hard to action with any credible -- without any
23 credible threat so, you know, that's -- I would say that was
24 our reflection. But I -- and I -- you know, from my
25 understanding of -- you know, given the SITE protocols were
26 new, the government was kind of feeling its way through what
27 was an appropriate level of disclosure to political parties
28 and what -- you know, what did they keep classified.

1 **MS. KATE McGRANN:** Turning away from your
2 experience as a designated representative to the SITE Task
3 Force, I just want to ask both you and Ms. McGrath about any
4 information you may have been hearing from people
5 volunteering or working for your respective parties during
6 the election.

7 I'll start with you, Mr. Ishmael. Did the
8 Liberal Party received any concerns from anyone working on
9 Liberal nomination or election campaigns in 2019 about
10 potential for an inference?

11 **MR. AZAM ISHMAEL:** I did not receive any
12 information, no.

13 **MS. KATE McGRANN:** Ms. McGrath, did the NDP
14 receive any concerns from anyone working on NDP nomination or
15 election campaigns in 2019 about potential foreign
16 interference?

17 **MS. ANNE McGRATH:** No.

18 **MS. KATE McGRANN:** We'll now shift our
19 attention to the 2021 General Election, and I'll start with
20 some questions about the awareness of your respective parties
21 about foreign interference as a potential concern heading
22 into that election.

23 Ms. McGrath, describe the NDP's awareness of
24 foreign interference as a potential issue heading into the
25 2021 General Election.

26 **MS. ANNE McGRATH:** I think that we had a
27 sense that it was a potential based on past experience, but
28 in almost all cases any information about foreign

1 interference in elections has been after the fact and through
2 -- mostly through the media.

3 **MS. KATE McGRANN:** And you referenced past
4 experience in your answer. What were you referring to when
5 you said "based on past experience"?

6 **MS. ANNE McGRATH:** Well, for instance, there
7 was someone in the 2019 campaign who had been -- who was
8 arrested in Norway, I believe, and who was accused of being
9 arrested for being a Russian spy and had been a volunteer on
10 one of the campaigns, one of our campaigns. So that was -- I
11 believe that came out in the media very, very much years
12 after the campaign had happened, and it happened in Norway,
13 not in Canada.

14 **MS. KATE McGRANN:** Am I right in
15 understanding that you learned about the events that you just
16 described through the media?

17 **MS. ANNE McGRATH:** That's correct, yes.

18 **MS. KATE McGRANN:** Do you recall when you
19 learned about those events?

20 **MS. ANNE McGRATH:** I think it was after the -
21 - it was probably just prior to the 2021 campaign and it was
22 -- I heard it on the radio and I've seen a written article
23 about it as well.

24 **MS. KATE McGRANN:** Did the Party take any
25 steps further to the reports that you learned of?

26 **MS. ANNE McGRATH:** No, it was -- as I said,
27 it was years after and there was nothing to take steps on.
28 There's not enough -- this goes generally on all of these

1 things. There wasn't enough information, resources or tools.

2 **MS. KATE McGRANN:** Turning to you, Mr.
3 Soliman, would you please describe the Conservative Party's
4 awareness of foreign interference as a potential issue
5 heading into the 2021 general election?

6 **MR. WALIED SOLIMAN:** I would say it was very
7 low on the radar.

8 **MS. KATE McGRANN:** Mr. Ishmael, would you
9 please describe the Liberal Party's awareness of foreign
10 interference as a potential issue heading into the 2021
11 General Election?

12 **MR. AZAM ISHMAEL:** It was low on the radar.

13 **MS. KATE McGRANN:** Let's turn now to your
14 experiences as the designated representatives of your
15 respective parties to the SITE Task Force in 2021.

16 Mr. Soliman, I'll start with a couple of
17 questions for you.

18 Would you please describe your experience as
19 the Conservative Party representative designated to receive
20 briefings from the SITE Task Force in advance of the 2021
21 General Election?

22 **MR. WALIED SOLIMAN:** It was a role that Erin
23 took very seriously. Erin was the leader of the Party at the
24 time.

25 We went through quite an extensive security
26 clearance. My overall sense was that I really didn't learn
27 anything in the briefings that I didn't regularly read in the
28 New York Times or any other -- or the Globe and Mail or

1 Toronto Star. There was -- it was a high potential exercise,
2 I think, and I strongly support us continuing to have this
3 type of task force. But unfortunately, I don't think -- I
4 certainly didn't come away from it learning anything that I
5 wouldn't have known reading the newspapers. I often wondered
6 why I went through such an extensive security clearance to
7 listen to the briefings we were listening to.

8 **MS. KATE McGRANN:** Two follow-up questions on
9 that answer.

10 First of all, you referenced "Erin". I take
11 it that is a reference to Erin O'Toole?

12 **MR. WALIED SOLIMAN:** Correct.

13 **MS. KATE McGRANN:** And you described your
14 experience as a high potential exercise. What did you mean
15 by that?

16 **MR. WALIED SOLIMAN:** I think that if the SITE
17 Task Force was to be utilized as a tool to interface with
18 security cleared, trusted members of the -- of our political
19 parties to clearly share appropriate intelligence and to
20 assist the political parties in ensuring that any foreign
21 interference is identified early, any potential actors are
22 identified early so that we can deal with them in an
23 appropriate manner, I think that would be a very positive
24 outcome.

25 That was my expectation, but just sort of
26 listening to briefings on things that I think, as Azam put
27 it, were probably not actionable, and as I would put it, that
28 were largely, not largely, entirely already known to us, was

1 not a good use of time, and probably not a good use of
2 resources.

3 **MS. KATE McGRANN:** Turning to you,
4 Ms. McGrath.

5 **COMMISSIONER HOGUE:** I have a question to
6 Mr. Soliman.

7 Did you have the opportunity to ask questions
8 during these briefings, or you were mainly receiving
9 information?

10 **MR. WALIED SOLIMAN:** Yes, we had the
11 opportunity to ask questions, and I often did. I was quite
12 interested. I was quite curious, but really at no point did
13 we get -- at no point did I feel I got any information that
14 was useful or actionable.

15 **COMMISSIONER HOGUE:** Thank you.

16 **MS. KATE McGRANN:** Ms. McGrath, please
17 describe your experience as the designated NDP representative
18 to the SITE Taskforce in advance of the 2021 general
19 election.

20 **MS. ANNE McGRATH:** They -- I went through the
21 secret security process, which was fairly extensive. I was
22 struck by the amount of resources in the room because there
23 were high level representatives from each of the agencies. I
24 would agree that there was -- the information that was given
25 seemed to me to be fairly generic, really, not -- again, not
26 actionable. Questions were asked, but the answers were not
27 necessarily -- the answers didn't give you the -- any
28 information that would be helpful or any resources that would

1 be helpful to deal with things. Questions such as if there
2 were foreign interference in this aspect of the election
3 campaign, how would we know it, and what would we do about
4 it? And those were the kinds of questions that I think the
5 parties were asking, and that information was not available.
6 But there was a lot of -- there were PowerPoint presentations
7 on different aspects of election interference.

8 **MS. KATE McGRANN:** Speaking in generalities,
9 did you feel that you had the information you needed to know
10 where to turn if you became aware of any concerns about
11 potential foreign interference?

12 **MS. ANNE McGRATH:** I was given names and
13 contact information for people that I could contact if there
14 was anything. But again, as I said, I never felt like I had
15 the tools to actually identify if and when it was happening.

16 **MS. KATE McGRANN:** Mr. Ishmael, you have the
17 benefit of having experienced the 2019 SITE Task Force
18 briefings. Perhaps in reference to that experience could you
19 describe your experience as the Liberal Party representative
20 to the SITE Taskforce in advance of the 2021 general
21 election?

22 **MR. AZAM ISHMAEL:** I would say when we
23 attended the 2021, it didn't feel like a lot of new
24 information was being shared, even though a number of years
25 had transpired, or had passed. So it kind of felt that I was
26 participating in foundational briefings that I had received
27 in 2019.

28 **MS. KATE McGRANN:** We'll turn now to some

1 examples of SITE Task Force briefings that were delivered in
2 2021, and we'll start with the document at CAN 18041.

3 --- EXHIBIT No./PIÈCE No. CAN 18041:

4 SITE TF Briefing to Secret Cleared
5 Federal Political Parties

6 **MS. KATE McGRANN:** This is a document dated
7 July 2021, titled SITE TF Briefing to Secret Cleared Federal
8 Political Parties. This document sets out information on why
9 you should care about foreign interference, what is foreign
10 interference, and what are foreign interference threat
11 actors.

12 If we could turn to page 2 of this document,
13 and look to the bottom of the page under the heading, Lessons
14 Learned from 2019. You see three bullet points here, and
15 they read as follows:

16 "The SITE Task Force...saw no
17 definitive intelligence to indicate
18 that foreign state actors were
19 specifically targeting Elections
20 Canada...or Canadian electoral
21 systems and networks.
22 SITE also saw no evidence of a broad-
23 based foreign state-directed
24 interference campaign in the digital
25 information ecosystem, but noted that
26 determining state attribution and
27 disinformation campaigns was and
28 remains difficult."

1 And finally:

2 "SITE did observe foreign
3 interference...activities targeting
4 certain ridings and candidates in
5 relation to the election, directed
6 largely from China, and to a lesser
7 extent from India and Pakistan,
8 through the use of human agents.
9 None of the activities have met the
10 threshold to pursue criminal
11 investigations."

12 Speaking only in generalities, are you able
13 to tell us, Mr. Soliman, whether this information is
14 consistent with the nature of the information you recall
15 receiving at the SITE Task Force you attended?

16 I'm sorry, I'll have to interrupt you because
17 it seems that you're on mute.

18 **MR. WALIED SOLIMAN:** Could you go back to the
19 top, please?

20 **MS. KATE McGRANN:** Yes.

21 Could we scroll back to the top of the first
22 page.

23 **MR. WALIED SOLIMAN:** So I certainly don't
24 recall Canada has a been a target for many years. And if you
25 go to the paragraphs that you were just referring to, those
26 three. I do recall -- I do recall the arc the discussion
27 that there was nothing to worry about from 2019. I don't
28 ever recall Pakistan being mentioned.

1 And I just would note, I don't recall ever
2 receiving this document, so this may have been somebody's
3 talking points, but I -- we certainly -- I certainly don't
4 recall receiving a document that looked like this. Maybe
5 others have, but I certainly don't.

6 **MS. KATE McGRANN:** With respect to your
7 recollection about what you were told about the potential
8 threat, was the nature of the information that was provided
9 to you useful to your party?

10 **MR. WALIED SOLIMAN:** Well, it was comforting
11 because it was -- it sort of affirmed our -- my -- our
12 pre-existing view that this -- that foreign interference
13 should be low on the radar because in 2019 there was nothing
14 to worry about.

15 **MS. KATE McGRANN:** Ms. McGrath, again
16 speaking in generalities, first of all, is this information
17 consistent with what you recall learning through your
18 attendance at the SITE Task Force briefings in 2021?

19 **MS. ANNE McGRATH:** Yes. The information was
20 that there was not a -- that there may be attempts but that
21 there was little evidence to support any substantial impact
22 on our elections. I would agree that I did not see this
23 document at any point. As a matter of fact, most of the
24 briefings were -- at the SITE Task Force were verbal and
25 PowerPoints, and we had no paper or pens or anything like
26 that to take notes or anything.

27 **MS. KATE McGRANN:** And -- thank you with that
28 context. Was information of this nature useful to your

1 party?

2 **MS. ANNE McGRATH:** Yes, it was useful to know
3 that there was -- that this was not a -- like a major concern
4 that we had to deal with in the campaign. That we needed to
5 be alert but not to devote substantial resources to it.

6 **MS. KATE McGRANN:** Mr. Ishmael, is the
7 information that we've reviewed in this document consistent
8 with the information that you recall receiving from the SITE
9 Task Force briefings in 2021?

10 **MR. AZAM ISHMAEL:** Yes.

11 **MS. KATE McGRANN:** And was information of
12 this nature useful to your party?

13 **MR. AZAM ISHMAEL:** Similar to Anne, it was
14 useful in it allowed us a high level of comfort and to know
15 where to position our resources in response to the threat.

16 **MS. KATE McGRANN:** Turning to page 3 of this
17 document, and I'd like to draw your attention to the heading
18 at the top of the page, Foreign Interference Threat
19 Environment in 2021.

20 The first two bullet points under this
21 heading read as follows:

22 "The COVID-19 pandemic has negatively
23 impacted the ability of state actors
24 to engage in foreign
25 interference...via direct human
26 interaction, but created
27 opportunities for cyber activities
28 and online disinformation campaigns.

1 As the situation in Canada
2 normalizes, [foreign interference]
3 efforts will likely resume previous
4 intensity, especially in the lead-up
5 to a Federal Election in Canada."

6 And the next bullet point reads:

7 "The People's Republic of
8 China...will be the primary threat
9 actor in an upcoming federal
10 election. Due to tensions in the
11 bi-lateral relationship and PRC
12 activity directed against Canada's
13 Parliament and certain MPs, the PRC
14 may interfere in specific ridings to
15 either support those viewed to be
16 'pro-PRC', or oppose those viewed to
17 be 'anti-PRC'."

18 Start with you, Mr. Ishmael, speaking in
19 general terms, are you able to tell us whether this is
20 consistent with the nature of the information you recall
21 receiving at the SITE Task Force briefings you attended.

22 **MR. AZAM ISHMAEL:** I don't remember these
23 paragraphs specifically, like, in I don't believe we saw this
24 document, but generally speaking, this was the nature of the
25 briefing, yes.

26 **MS. KATE McGRANN:** And was this information -
27 - was information of this nature useful to your party?

28 **MR. AZAM ISHMAEL:** Similar to the previous

1 statement, you know, given that it was identified to be a low
2 threat in 2019, the evolving threat in 2021 didn't really
3 surprise us.

4 **MS. KATE McGRANN:** Mr. Soliman, speaking
5 generally, is this -- is information -- sorry, pardon me. Is
6 this information consistent with the nature of the
7 information you recall receiving at the SITE Task Force
8 briefings you attended?

9 **MR. WALIED SOLIMAN:** No. I can tell you, if
10 the words the PRC may interfere in specific ridings to either
11 support those viewed to be pro-PRC or oppose those views to
12 be anti-PRC, I think any political party would have been
13 alarmed by that statement and would have, in the very least,
14 engaged further and asked a lot of questions, or developed --
15 tried to develop some sort of strategy to at least
16 institutionalize the monitoring of this. So, no, I do not
17 recall that. And again, I'll just remind you I don't -- I
18 certainly don't recall, and I think my colleagues as well
19 don't recall ever getting this document.

20 **MS. KATE McGRANN:** So am I correct in
21 understanding you to be saying that if you had received
22 information of the nature or similar to the information shown
23 on this screen, you're of the view that that would have been
24 helpful to have received?

25 **MR. WALIED SOLIMAN:** Absolutely. Of course.

26 **MS. KATE McGRANN:** Ms. McGrath, speaking in
27 general terms, is the information we've reviewed here
28 consistent with the nature of the information you recall

1 receiving at the SITE Task Force briefings you attended?

2 **MS. ANNE McGRATH:** I believe it is more
3 specific than anything that I recall receiving. I will say
4 that in the 2021 campaign, whether it was through the SITE
5 Task Force or just in general, the major public safety threat
6 that we were operating under was having an election during a
7 pandemic, and that was the primary -- our primary concern
8 during that campaign.

9 **MS. KATE McGRANN:** In your view, I understand
10 you don't recall receiving information with this level of
11 specificity?

12 **MS. ANNE McGRATH:** That's correct.

13 **MS. KATE McGRANN:** Would information of this
14 level of specificity have been useful to your party?

15 **MS. ANNE McGRATH:** I believe it would have
16 been useful, yes.

17 **MS. KATE McGRANN:** Would you please explain
18 why?

19 **MS. ANNE McGRATH:** Well, I think that if
20 there was any sense that there were -- that there was going
21 to be activity by the People's Republic of China against
22 certain -- against Parliament and certain MPs, and
23 interference in specific ridings, it would have been useful
24 to know that. It would have been useful to know which
25 ridings, what type of interference, and what we would -- what
26 we should do about it. Again, this goes back to the
27 questions that the parties asked in the SITE Task Force
28 meetings of how do we know, who will let us know if somebody

1 else knows, and what do we do about it.

2 **MS. KATE McGRANN:** I'd like to turn to
3 another document. If we could pull up CAN 13124?

4 **--- EXHIBIT No./PIÈCE No. CAN 13124:**

5 CPC Concerns around Foreign Election
6 Interference 2021

7 **MS. KATE McGRANN:** This is a document titled
8 "Transmittal Note. CPC Concerns Around Foreign Election
9 Interference". I want to take you to a very specific
10 paragraph within a document appended to this memo, so could
11 we please turn to page 18?

12 This is a document titled "Call with Walied
13 Soliman and Tausha Michaud. CPC Concerns Around Election
14 Interference". I'm not going to ask any of you questions
15 about this call at this time, but I do want to draw your
16 attention to a specific bullet point at the bottom of the
17 page under the heading "Specific Case".

18 The first bullet point under the heading
19 "Specific Case" describes two security briefings delivered to
20 political parties and I would like to review that with you
21 here. This bullet point says,

22 "You may remember at the last two
23 security briefings we held with the
24 parties, SITE highlighted the fact
25 that Chinese media had picked up on
26 Canadian media criticism (first
27 published in the Hill Times) and were
28 running stories about the CPC

1 platform and its impact on Canada-
2 China relations."

3 Now I'm not asking you about the document,
4 but I am asking you about the description of the two security
5 briefings that we see in that bullet point. Once again,
6 speaking only in general terms, and starting with you, Mr.
7 Soliman, are you able to tell us whether information of this
8 nature is consistent with the nature of the information you
9 recall receiving at the SITE Task Force briefings you
10 attended?

11 **MR. WALIED SOLIMAN:** Unfortunately, not.
12 Unfortunately, no.

13 **MS. KATE McGRANN:** And just to help me
14 understand what exactly that no means, are you saying ---

15 **MR. WALIED SOLIMAN:** I ---

16 **MS. KATE McGRANN:** --- no, you're not able to
17 tell us, or ---

18 **MR. WALIED SOLIMAN:** No, I ---

19 **MS. KATE McGRANN:** --- no, it's not
20 consistent?

21 **MR. WALIED SOLIMAN:** No, it is not
22 consistent. I do not recall any briefing of this specificity
23 on any issue, let alone something that would impact one of
24 the party platforms specifically.

25 **MS. KATE McGRANN:** Would information of this
26 nature have been useful to your party?

27 **MR. WALIED SOLIMAN:** Of course. Of course.

28 **MS. KATE McGRANN:** And would you please

1 explain why?

2 **MR. WALIED SOLIMAN:** Well, as per my previous
3 answer, if there's a specific threat or a potential of a
4 specific threat that's been -- that's being identified, which
5 I think would have been a very good use of the SITE Task
6 Force and the time of the individuals that were involved, we
7 would have institutionalized at least some method of
8 monitoring what was going on. So I certainly -- it would
9 have been quite helpful.

10 **MS. KATE McGRANN:** Ms. McGrath, speaking in
11 general terms, are you able to tell us whether this is
12 consistent with the nature of the information you recall
13 receiving at the SITE Task Force briefings you attended?

14 **MS. ANNE McGRATH:** I don't recall that
15 discussion at all, or that level of specifics.

16 **MS. KATE McGRANN:** In your view, would
17 information of this level of specificity have been of
18 assistance to your party?

19 **MS. ANNE McGRATH:** Well, it looks to me that
20 this is primarily around the CPC platform, but I think it
21 would have been good to know that this was happening, if --
22 and again, if there were any concerns about it having an
23 impact on other parties, what to do about it.

24 **MS. KATE McGRANN:** Mr. Ishmael, speaking
25 generally, are you able to tell us whether this is consistent
26 with the nature of the information you recall receiving at
27 the SITE Task Force briefings?

28 **MR. AZAM ISHMAEL:** I don't recall this

1 specific case, although in 2021 I did miss more SITE meetings
2 than I did in 2019, just given my additional responsibilities
3 in National Campaign Director and National Director, so as a
4 generic statement, I would say this is the type of
5 information that was shared, but not to that level of
6 specificity.

7 **MS. KATE McGRANN:** And with respect to the
8 specificity we see summarized here, would information of that
9 level of specificity have been of use to your party?

10 **MR. AZAM ISHMAEL:** Absolutely. Like Mr.
11 Soliman, we would have known to be more alert to the
12 situation and monitored appropriately.

13 **MS. KATE McGRANN:** And we can take this
14 document down. I'd like to now ask you some questions about
15 information that you may have heard from those who were
16 working for or volunteering with your parties during the 2021
17 election and period leading up to it. I'll start with you,
18 Mr. Ishmael. As National Campaign Director for the 2021
19 campaign, am I right that you did not receive any concerns of
20 complaints about potential foreign interference from Liberal
21 Party candidates or staff?

22 **MR. AZAM ISHMAEL:** Correct.

23 **MS. KATE McGRANN:** Turning to you, Mr.
24 Soliman, I understand that field and regional organizers
25 began reporting concerns about foreign interference to the
26 party part of the way through the campaign; is that right?

27 **MR. WALIED SOLIMAN:** Correct.

28 **MS. KATE McGRANN:** Do you recall when those

1 concerns were first reported to the party?

2 **MR. WALIED SOLIMAN:** I don't recall. It
3 would have been somewhere over the course of the campaign,
4 latter part of the campaign, likely.

5 **MS. KATE McGRANN:** Can you describe the
6 concerns that were reported to the party?

7 **MR. WALIED SOLIMAN:** They're as set out in
8 the witness statement. I don't think I really have anything
9 to add from what was set out there.

10 **MS. KATE McGRANN:** And if you could just help
11 us out with your response to that question? Now I understand
12 that it's in the witness statement, but it would be useful to
13 hear it from you today.

14 **MR. WALIED SOLIMAN:** We started getting
15 information on a few targeted ridings where there seemed to
16 be campaigns of misinformation that were -- that appeared to
17 be being advanced by actors that we couldn't -- that the
18 local campaigns couldn't identify.

19 **MS. KATE McGRANN:** You mentioned a few
20 targeted ridings. Do you remember which ridings you're
21 referring to?

22 **MR. WALIED SOLIMAN:** I don't have them in
23 front of me right now.

24 **MS. KATE McGRANN:** Is that information that
25 you could access if you were given the opportunity to go look
26 for it?

27 **MR. WALIED SOLIMAN:** I believe it's in the --
28 it's in the list that we ultimately provided to the SITE

1 Taskforce. I think it's in one of your exhibits.

2 **MS. KATE McGRANN:** You mentioned a
3 misinformation campaign. What do you recall about the
4 details of the misinformation campaign?

5 **MR. WALIED SOLIMAN:** So you would expect,
6 sort of during the fog of a campaign, sort of getting calls
7 from a few local ridings where there was messaging of
8 information on -- misinformation on everything from Mr.
9 O'Toole's policies on crime and safety and foreign policy
10 issues specifically around the Uyghur issue.

11 **MS. KATE McGRANN:** Do you remember seeing or
12 being show any specific examples of the misinformation that
13 you described?

14 **MR. WALIED SOLIMAN:** Not during the campaign.

15 **MS. KATE McGRANN:** Do you remember seeing or
16 being shown specific examples after the campaign?

17 **MR. WALIED SOLIMAN:** Yes.

18 **MS. KATE McGRANN:** Would you please describe
19 what you recall being shown?

20 **MR. WALIED SOLIMAN:** There were really what's
21 in the exhibit that we sent in, that we -- you can just pull
22 up if you'd like.

23 **MS. KATE McGRANN:** Could you just give us a
24 summary of your recollection before I do that?

25 **MR. WALIED SOLIMAN:** I'd rather refer to the
26 exact document that we sent you than just go by recollection
27 from three years ago almost.

28 **MS. KATE McGRANN:** Fair to say that you don't

1 have a particularly clear or detailed recollection of these
2 instances?

3 **MR. WALIED SOLIMAN:** Not right now, no.

4 **MS. KATE McGRANN:** And we will turn to a
5 document that sets out summaries and details about those
6 concerns in a minute, but before we do, how did the party
7 respond to the concerns that were brought to it?

8 **MR. WALIED SOLIMAN:** Initially during the
9 campaign, the view was, "Get back to work on your campaigns."
10 You know, I had the confidence at the
11 briefings that there was nothing that had gone wrong in 2019
12 and had no reason to believe that there was anything going on
13 in 2021.

14 I also had the confidence that if there was
15 actually something going on that, I think as Anne said, there
16 were a lot of senior people that were spending time with us,
17 if there was something serious happening, I would have
18 expected that someone would have let us know.

19 And so in the middle of a campaign, the
20 response was, "Get back to work on the campaign." It was
21 really only after the campaign was done that we really
22 started hearing about it from a number of ridings, getting
23 quite a bit of information, which we ultimately ended up
24 delivering to the SITE Taskforce, which we thought was the
25 right and responsible way to advance this.

26 **MS. KATE McGRANN:** Can we please turn up CAN-
27 13124?

28 Now, this is a transmittal note that we

1 looked at a few moments ago for a different purpose, but for
2 the purpose of these questions, we're looking at a
3 transmittal note dated March 24th, 2023. The subject is:
4 "CPC CONCERNS AROUND FOREIGN ELECTION INTERFERENCE 2021".

5 If we could go to page 3 of the document?
6 Pardon me, could we please go to page 2 of the document?
7 This is a memorandum for the Clerk of the Privy Council
8 titled "CPC CONCERNS AROUND FOREIGN ELECTION INTERFERENCE
9 2021".

10 Do you remember seeing a copy of this
11 document in 2021 or shortly thereafter?

12 **MR. WALIED SOLIMAN:** No, of course not.
13 Absolutely not. We never saw this. And I, in fact, just
14 read it this morning.

15 **MS. KATE McGRANN:** Thank you. Could we
16 please turn to page 3 of this document?

17 Under the heading "BACKGROUND", we see a
18 summary of the concerns the Conservative Party expressed to
19 the SITE Taskforce after the 2021 election, this document
20 says PCO, Privy Council Office:

21 "...was first approached with concerns
22 of foreign interference by the CPC on
23 September 24[th], 2021. The election
24 had occurred a few days prior, on
25 September 20[th], 2021. The CPC
26 provided a document outlining their
27 concerns and suspicions that an
28 'outside actor' in the Chinese

1 community negatively influenced the
2 CPC Candidates' performance in 13
3 electoral ridings.

4 The CPC expressed a concern that
5 there was a proliferation of media
6 content on WeChat and other social
7 media platforms that was anti-
8 Conservative, expressed support for
9 the Liberal Party of Canada [...], and
10 suppressed pro-CPC articles."

11 And there's a reference here to a document
12 that's appended in this memo that I'm not going to take you
13 to in the interests of time today.

14 It goes on to state that:

15 "The CPC also detailed other observed
16 incidents that were suspected
17 indicators of influence, or
18 interference, by the Chinese
19 Government."

20 It indicates that there are details appended
21 at Tab A, but we're going to look at the summary here. These
22 included:

23 "Anti-CPC ads displayed on a digital
24 screen in a Chinese grocery store in
25 one riding;
26 Automated 'bots' completing polling
27 surveys;
28 Allegations that 'organizers' in

1 specific communities requested and
2 cast ballots on behalf of [certain]
3 electors; and
4 Reports of business owners pushing
5 employees to vote for the [Liberal
6 Party of Canada], and other voter
7 intimidation and influence."

8 Is this summary consistent with your
9 recollection of the information that you provided further to
10 the concerns that the Party received?

11 **MR. WALIED SOLIMAN:** Let me just start off by
12 addressing the memo. And again, I received it at 2:00
13 o'clock this morning and had an opportunity to review it for
14 the very first time ever early this morning when I -- in
15 preparing for this.

16 Rarely do I get upset when I read something.
17 This memo would fall into that category.

18 As starting point -- as a starting point, the
19 memo says that Tausha Michaud and I were threatening to go
20 public with our views.

21 I want to be very clear. At no time, at no
22 time, did Erin O'Toole or any member of his team try to make
23 some Trumpian assertion that the election was lost to the
24 Conservatives because of foreign interference.

25 We believe that there was -- we believed at
26 that point that there was something wrong that was happening,
27 we didn't quite understand it, and we approached the SITE
28 Taskforce because of the amount of information that we had

1 gotten in the days after the election, with an intention of,
2 "Here's what we got. In my case, I'm a volunteer, but as a
3 person who cares about the political process, when we're
4 getting this many concerns from this many ridings, it seems
5 to me that the right place for this to be discussed is with
6 you." We did not go to the press. We did not have Erin
7 stand in front of a camera. The campaign team didn't do
8 that. We were -- we went through the process that we thought
9 was appropriate and we provided the information as best we
10 could collect it without ever making an assertion that there
11 was even foreign interference at that point. We did not
12 know.

13 The second thing I'd just like to address
14 because I don't know what other questions you're going to be
15 asking about this and I think it's important to get onto the
16 record is in the conclusions of the gentleman who wrote this,
17 he says that we were not happy with the outcome. That's
18 ludicrous. It's absolutely ridiculous.

19 We were never unhappy with the outcome. I'm
20 not a security expert. I have no idea when something crosses
21 into the line of foreign interference versus, you know,
22 community members just posting things on chat groups.

23 What I was disappointed about, really, was
24 affirmed when I read this memo. I felt that there was a lack
25 of intentionality, a lack of seriousness and a lack of
26 respect for the process that all of our parties are involved
27 in to have gotten just sort of a very summary briefing a few
28 days before the caretaker government was done and the new

1 government was sworn in to just sort of say, "Yeah, we looked
2 at it. We don't -- couldn't really find anything. We don't
3 have any other real explanation for you, and away we go".

4 So I wanted to get those things on the
5 record.

6 As for the summary that's here, I would refer
7 you to the letter for an accurate description of the items
8 that we simply put forward. It was not an advocacy piece.
9 It wasn't written by me as a -- I'm a lawyer by trade. It
10 wasn't -- it was written by our political team saying, "Here
11 you go. Please let us know what you think because we're
12 suddenly getting a lot of complaints".

13 There wasn't a single story on it, there
14 wasn't a single Tweet on it, there wasn't a single discussion
15 on it publicly. And frankly, when I read this memo, I felt
16 it affirmed to me that we were being managed as opposed to
17 having folks take a serious look at what were quite
18 concerning issues.

19 That's a long answer for you. I'm sure my
20 counsel's not happy with me speaking that long.

21 **MS. KATE McGRANN:** I'm going to look to my
22 friends for assistance in finding the page number at which
23 the letter that you were referring to is found at this
24 document, so please bear with me for a moment because I
25 understand you to be saying, in effect, that rather than
26 providing a summary of the concerns that you expressed, the
27 memo that you submitted speaks for itself and you'd prefer to
28 be referred to that memo.

1 **MR. WALIED SOLIMAN:** Please.

2 **MS. KATE McGRANN:** While we're waiting for
3 that information, let's turn to the response that you
4 received to the complaint submitted.

5 If we could scroll down the page. And back
6 up a little bit.

7 We're looking at the last bullet point on
8 this page, which reads as follows:

9 "Global Affairs Canada, the
10 Communications Security Establishment
11 and the Canadian Security
12 Intelligence Service examined the
13 information provided by the CPC, and
14 conducted additional analysis using
15 information collected under their
16 respective mandates. Based on the
17 available evidence and information,
18 the agencies were unable to conclude
19 that there was a clandestine campaign
20 to influence the outcomes of the 13
21 ridings identified by the CPC."

22 Is that summary consistent with your
23 recollection of the response that the Party received to the
24 information it submitted?

25 **MR. WALIED SOLIMAN:** Yes.

26 **MS. KATE McGRANN:** Now, you've already given
27 us a little bit of information about this question, but would
28 you please describe your reaction to the response that you

1 received?

2 **MR. WALIED SOLIMAN:** Our reaction was, one,
3 to ask for more, and the response was a bit of an
4 infuriating, and it's been affirmed in this note, "We're not
5 sure if we could speak with you after the new government is
6 sworn in".

7 And again, I can't imagine that the
8 government of the time would have -- would have been opposed
9 to a continuing dialogue to figure out what was going on.

10 And that was really it. I, you know,
11 reminded our friends that political parties, all three of our
12 political parties, are in the vote-getting and the
13 fundraising business. We're not in the security business.
14 We're not in the foreign interference identification business
15 and we rely on them to do that.

16 My feeling at the time, notwithstanding this
17 answer, was that there was a lack of seriousness in the
18 approach and response, keeping in mind, of course, that at
19 this point we did not know that there were any issues in
20 2019, which obviously compounded the view on this later on.

21 **MS. KATE McGRANN:** I took note of three words
22 that you used when you were describing your reaction to the
23 response, and I want to give you an opportunity to expand on
24 each of them a little bit.

25 The first one was your observation that you
26 felt there was a lack of intentionality. What did you mean
27 when you said that?

28 **MR. WALIED SOLIMAN:** It did not feel that

1 there was a robust process in coming to the conclusions that
2 were set out to us. We'd provided information, in our view,
3 that was coming from different ridings, different
4 individuals. You know, we approached it in a manner that we
5 thought was respectful and adhered to the rules that had been
6 set out, and we sort of got a, "Hey, can we have a video
7 conference two days before the new government's going to be
8 sworn in so we can kind of have a couple of words to tell you
9 what we think?".

10 You'll note in the memo here -- again, it
11 surprised me a little bit this morning -- was that there was
12 an individual who was brought on to make sure that there were
13 appropriate communications lines opened or something as if it
14 was a cons exercise as opposed to a -- as opposed to a truth
15 gathering and an important public policy exercise, which was
16 the intention that we were going at it with.

17 **MS. KATE McGRANN:** You also noted you felt
18 there was a lack of seriousness and respect. Is there
19 anything that you would add to the answer you just gave to
20 help us understand why you formed those views?

21 **MR. WALIED SOLIMAN:** No.

22 **MS. KATE McGRANN:** With respect to the letter
23 or memo that was provided, could we please turn to page 7 of
24 this document?

25 I'll give you a second to take a look at
26 this, and my only question for you here is, is this the
27 document that you were referring to when you pointed us to
28 the specific information submitted?

1 **MR. WALIED SOLIMAN:** I don't have the
2 original to compare it to, but if you're telling me this was
3 -- this is a true copy of what was delivered, I'll accept it.

4 **MS. KATE McGRANN:** Turning to you, Ms.
5 McGrath -- and again, we're talking about complaints or
6 concerns raised after the election. I understand that Jennie
7 Kwan raised concerns about foreign interference to your
8 Party.

9 Would you please describe your understanding
10 of those concerns?

11 **MS. ANNE McGRATH:** There were media reports
12 that certain Members of Parliament had been targeted by the
13 Chinese government and one of the MPs that was named in that
14 was Jenny Kwan. I believe there were other MPs as well, and
15 she was concerned about that.

16 **MS. KATE McGRANN:** When did the NDP learn of
17 these concerns?

18 **MS. ANNE McGRATH:** This is not that long ago,
19 actually. This would have been, I would say, within -- I'm
20 guessing. I think it was like a year ago when this started
21 to be very, very prominent in the media and there was a
22 report then about -- and the two MPs that I recall were MP
23 Michael Chong and MP Jenny Kwan being targeted by the Chinese
24 state.

25 **MS. KATE McGRANN:** Describe the NDP's
26 reaction to learning of those concerns.

27 **MS. ANNE McGRATH:** We were concerned. We
28 didn't have any information beyond what -- beyond those

1 statements, that they had been identified and targeted, and
2 we didn't know what that meant in -- you know, in a concrete
3 way, and again, or what to do about it. So one of the things
4 that we did was there had -- at that point, the special
5 rapporteur had been named, David Johnston, and he asked for a
6 meeting with our leader, Jagmeet Singh, and I was at that
7 meeting as well. And Jagmeet invited Jenny Kwan to come to
8 the meeting to express her concerns about the impact that
9 this was having on her and on her community.

10 **MS. KATE McGRANN:** I also understand that
11 federal NDP lawyers made a complaint to Elections Canada, or
12 the Commissioner of Canada Elections, in relation to
13 Ms. Kwan's 2021 election campaign. Do you recall which of
14 those entities the complaint was made to?

15 **MS. ANNE McGRATH:** Pardon me?

16 **MS. KATE McGRANN:** Do you recall which of
17 those two entities, Elections Canada or the Commissioner of
18 Canada Elections, the complaint was made to?

19 **MS. ANNE McGRATH:** I don't recall which one
20 it was, but it would have probably been the Commissioner.

21 **MS. KATE McGRANN:** What do you know about the
22 outcome of that complaint?

23 **MS. ANNE McGRATH:** My understanding is that
24 they were -- it was not deemed to be a matter of incredible
25 significance. There was a -- it was seen that there was a
26 problem, but it wasn't identified as a very high priority.

27 **MS. KATE McGRANN:** I have one final question
28 that I'll pose to each of you in turn, and the question is:

1 Other than what you've already explained, either through your
2 witness summary or in your evidence today, what could the
3 government have done to better assist your party in
4 countering or protecting against foreign interference in the
5 nomination and federal election campaigning process? And
6 I'll start with you, Ms. McGrath.

7 **MS. ANNE McGRATH:** Well, I would say that we
8 either take it seriously or we don't, and if it's going to be
9 taken seriously, and this is actually my primary interest in
10 this, then it needs to be -- as I said before, there are a
11 lot of resources devoted to it. There is some very high
12 level people in the room. I believe that the party
13 representatives probably require a higher level of security
14 clearance so that they can receive both classified and
15 unclassified documents, and I believe that the -- that there
16 needs to be information for political parties on how to
17 identify foreign interference, what to do about it, and who
18 to speak to or how to proceed with any issues that arise.

19 So I think that it -- as I said before, it
20 felt very much to me like we went through this whole process
21 to get security clearance, we had these meetings with these
22 very high level people in these -- all of these agencies, but
23 it still felt very much to me like a bit of a *pro forma* box
24 checking exercise.

25 **MS. KATE McGRANN:** Mr. Ishmael, same
26 question. Anything you'd like to add about what the
27 government could have done to better assist your party to
28 counter or protect against foreign interference in the

1 nomination federal election campaigning process?

2 **MR. AZAM ISHMAEL:** So expanding on what was
3 in my witness statement, which included briefing the leaders
4 directly, as well as, you know, specific recommendations
5 around technology and tools that we could use, I think I
6 would agree with Anne's idea of either increasing the
7 security clearance that the participants are given in the
8 room so that they can hear more, they can have more frank
9 conversations. But I'd generally say, as I think we've heard
10 from all three parties this morning, you know, specific
11 claims, but also, you know, if they're going to provide a
12 level of specificity, you know, what they plan on doing as a
13 -- either an action or a reaction.

14 **MS. KATE McGRANN:** Mr. Soliman, anything you
15 would like to add to what you've already shared in terms of
16 what the government could have done better to assist your
17 party to counter or protect against foreign interference in
18 the nomination and federal election campaign process?

19 **MR. WALIED SOLIMAN:** I don't think there's
20 anything to add from what my friends have articulated.

21 **MS. KATE McGRANN:** Those are my questions.
22 Commissioner, I wonder if it would be an appropriate time to
23 take the morning break.

24 **COMMISSIONER HOGUE:** Yes, for the break.
25 So we'll come back around 11:30, 35.

26 **THE REGISTRAR:** Order, please. À l'ordre,
27 s'il vous plaît. The hearing is in recess until 11:35. La
28 séance est en pause jusqu'à 11h35.

1 --- Upon recessing at 11:16 a.m./

2 --- La séance est suspendue à 11h16

3 --- Upon resuming at 11:37 a.m./

4 --- La séance est reprise à 11h37

5 --- MR. AZAM ISHMAEL, Resumed/Sous le même serment:

6 --- MR. WALIED SOLIMAN, Resumed/Sous le même serment:

7 --- MS. ANNE McGRATH, Resumed/Sous le même serment:

8 **THE REGISTRAR:** Order please. À l'ordre,
9 s'il vous plait.

10 This sitting of the Foreign Interference
11 Commission is back in session. Cette séance de la Commission
12 sur l'ingérence étrangère a repris.

13 (SHORT PAUSE)

14 **COMMISSIONER HOGUE:** So we'll begin the
15 cross-examination. I think the first one is counsel for Erin
16 O'Toole.

17 **MR. THOMAS JARMYN:** Thank you, Commissioner.

18 --- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR

19 MR. THOMAS JARMYN:

20 **MR. THOMAS JARMYN:** I was initially going --
21 my name's Tom Jarmyn. I represent Erin O'Toole.

22 I was initially going to put some specific
23 documents to you, ask your recollection of particular
24 incidents, but I suspect that would be a waste of time given
25 your evidence this morning. So I'll just ask sort of some
26 general questions.

27 So first of all, with respect to the 2019
28 election and the associated briefings, Mr. Ishmael, and

1 Ms. McGrath, do you recollect any briefings about specific
2 incidents of foreign interference that occurred during those
3 elections?

4 Ms. McGrath?

5 **MS. ANNE McGRATH:** I don't recall any
6 specific information, no.

7 **MR. THOMAS JARMYN:** And Mr. Ismael?

8 **MR. AZAM ISHMAEL:** Through the SITE
9 briefings, the group briefings, there was no specific
10 information, no.

11 **MR. THOMAS JARMYN:** And any other briefings
12 provided by the Government of Canada to you?

13 **MR. AZAM ISHMAEL:** There was one briefing in
14 which, and I can't go into the details of it, that was
15 provided to us one-on-one, which information, generally-
16 speaking, was shared with us.

17 **MR. THOMAS JARMYN:** All right. Thank you.

18 And with respect to the 2021 election, same
19 question, Ms. McGrath?

20 **MS. ANNE McGRATH:** Again, no specific
21 information coming from the SITE Task Force or any agency
22 about specific issues.

23 **MR. THOMAS JARMYN:** Okay. And Mr. Ishmael?

24 **MR. AZAM ISHMAEL:** The same response. In the
25 group setting, there was no specific information shared.

26 **MR. THOMAS JARMYN:** And Mr. Soliman?

27 **MR. WALIED SOLIMAN:** None.

28 **MR. THOMAS JARMYN:** Okay. And so with

1 respect to the issue of being alert to foreign interference,
2 I conclude from your examinations this morning that you were
3 not given, sort of, any indicia or indicators of foreign
4 interference that you should look for in the course of, Mr.
5 Ishmael and Ms. McGrath, of either the 2019 or the 2021
6 election?

7 **MR. AZAM ISHMAEL:** Outside of what was
8 presented this morning, correct.

9 **MR. THOMAS JARMYN:** Okay. And any -- were
10 you given any specific indicators that you should look for
11 and report, Ms. McGrath?

12 **MS. ANNE McGRATH:** No. We asked for that,
13 but no.

14 **MR. THOMAS JARMYN:** Okay. And Mr. Soliman,
15 the same question with respect to the 2021 election?

16 **MR. WALIED SOLIMAN:** None.

17 **MR. THOMAS JARMYN:** And I'd just like to
18 briefly touch on the issue of capacity. So political parties
19 are running national campaigns, and I'm to assume there's a
20 national infrastructure in every riding -- or an
21 infrastructure, sorry, in every riding. And is that true for
22 all three political parties, Mr. Ishmael?

23 **MR. AZAM ISHMAEL:** I would say every riding
24 where we're running a candidate, yes.

25 **MR. THOMAS JARMYN:** Yeah. And Ms. McGrath?

26 **MS. ANNE McGRATH:** Yes, we run a candidate in
27 every riding.

28 **MR. THOMAS JARMYN:** And Mr. Soliman?

1 **MR. WALIED SOLIMAN:** Yes.

2 **MR. THOMAS JARMYN:** And each one of those
3 ridings, there would have been a candidate, an official
4 agent, and probably a campaign manager? Is that correct?
5 For each one of you. Ms. McGrath?

6 **MS. ANNE McGRATH:** Correct. Yes.

7 **MR. THOMAS JARMYN:** And Mr. Ishmael?

8 **MR. AZAM ISHMAEL:** Correct.

9 **MR. THOMAS JARMYN:** And Mr. Soliman?

10 **MR. WALIED SOLIMAN:** Yes.

11 **MR. THOMAS JARMYN:** And am I to -- there's
12 regular communications to each one of those people, so the
13 campaign managers and official agents in particular, I
14 imagine candidates have other things to do, campaign managers
15 and official agents are in regular communication with your
16 national campaign? Is that correct, Ms. McGrath?

17 **MS. ANNE McGRATH:** Yes.

18 **MR. THOMAS JARMYN:** Mr. Ishmael?

19 **MR. AZAM ISHMAEL:** Yes.

20 **MR. THOMAS JARMYN:** And Mr. Soliman?

21 **MR. WALIED SOLIMAN:** Yes.

22 **MR. THOMAS JARMYN:** And if -- do you give --
23 or did your campaign give any direction to those folks to
24 report to you if they saw wrong doing in the context of the
25 *Elections Act* in general? So unlabeled signs, signs being
26 torn down, those sorts of things? Misbehaviour under the
27 *Elections Act*. Did you have any direction to report that
28 sort of information, Ms. McGrath?

1 **MS. ANNE McGRATH:** Yes, we did. We do that -
2 - we have regular communication with all of our candidates
3 and official agents and we are very -- we're very diligent
4 about advising people of what to look for and to make sure
5 that it gets reported.

6 **MR. THOMAS JARMYN:** And Mr. Ishmael?

7 **MR. AZAM ISHMAEL:** Same.

8 **MR. THOMAS JARMYN:** And Mr. Soliman?

9 **MR. WALIED SOLIMAN:** I wasn't involved in the
10 day to day, but I presume the same.

11 **MR. THOMAS JARMYN:** Okay. Thank you.

12 And in the course of the briefings provided
13 to you by either the SITE Taskforce or any other actor from
14 the Government of Canada, did they explain the lens at which
15 they were looking at foreign interference through? In other
16 words, did they explain that we're looking at this as a
17 national problem, as a riding-by-riding problem, as a
18 regional problem? Did anyone give you that kind of context
19 to the information that was being provided, Ms. McGrath?

20 **MS. ANNE McGRATH:** I don't recall anything
21 that specific, no.

22 **MR. THOMAS JARMYN:** Okay. Mr. Ishmael?

23 **MR. AZAM ISHMAEL:** I'd agree with Ms.
24 McGrath's perception.

25 **MR. THOMAS JARMYN:** Okay. Thank you.
26 Mr. Soliman?

27 **MR. WALIED SOLIMAN:** Agreed with Ms. McGrath.

28 **MR. THOMAS JARMYN:** Those are all my

1 questions. Thank you.

2 **COMMISSIONER HOGUE:** Thank you. So next one
3 is counsel for Michael Chan.

4 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

5 **MR. FRASER HARLAND:**

6 **MR. FRASER HARLAND:** Good morning,
7 Commissioner. My name is Fraser Harland. Counsel for
8 Michael Chan.

9 I only have about 10 minutes, so I'll be
10 directing most of my questions to Mr. Ishmael this morning.

11 Mr. Ishmael, I wanted to ask you some
12 questions about the Liberal Party's rules for nomination
13 contests.

14 To start, to state the obvious, nominations
15 are important because the nominee may become a Member of
16 Parliament; correct?

17 **MR. AZAM ISHMAEL:** Correct.

18 **MR. FRASER HARLAND:** And in a stronghold
19 riding, so a riding where a party has historically done very
20 well, the nominee is very likely to become a Member of
21 Parliament? Is that correct?

22 **MR. AZAM ISHMAEL:** Correct.

23 **MR. FRASER HARLAND:** So in order to vote in a
24 nomination contest, an individual has to be a member of the
25 Liberal Party; correct?

26 **MR. AZAM ISHMAEL:** They need to be a
27 registered Liberal.

28 **MR. FRASER HARLAND:** A registered Liberal?

1 Okay. And to be a registered Liberal, the individual must be
2 at least 14 years old; correct?

3 **MR. AZAM ISHMAEL:** Correct.

4 **MR. FRASER HARLAND:** And not a member of any
5 other federal political party?

6 **MR. AZAM ISHMAEL:** Correct.

7 **MR. FRASER HARLAND:** And ordinarily resident
8 in Canada?

9 **MR. AZAM ISHMAEL:** Well, to vote in the
10 nomination, meaning you need to ordinarily reside within the
11 riding that the nomination meeting is happening.

12 **MR. FRASER HARLAND:** Right. And to show
13 ordinary residence in Canada, that can be proved by showing a
14 piece of mail with a Canadian address? Is that right?

15 **MR. AZAM ISHMAEL:** The criteria for voting in
16 a local nomination meeting are pretty clear. They resemble
17 that of Elections Canada, which is either a piece of ID with
18 a photo and address, two pieces of proof of address, one with
19 -- that has the actual address, or they can be vouched for.

20 **MR. FRASER HARLAND:** But in an election, you
21 need to be a citizen; correct? In a General Election?

22 **MR. AZAM ISHMAEL:** Correct.

23 **MR. FRASER HARLAND:** And that's not true in a
24 nomination contest? You just need to be ordinarily resident;
25 correct?

26 **MR. AZAM ISHMAEL:** Correct.

27 **MR. FRASER HARLAND:** And that would mean that
28 international students would meet that requirement?

1 **MR. AZAM ISHMAEL:** Yes.

2 **MR. FRASER HARLAND:** And even if a student
3 was here for just a year, say, on a one-year study program,
4 they could also vote in a nomination?

5 **MR. AZAM ISHMAEL:** If they could prove their
6 proof of residence, yes.

7 **MR. FRASER HARLAND:** So that would mean that
8 people who have no intention of staying in Canada and plan to
9 return to their foreign country to live could still be
10 members of the Liberal Party; correct?

11 **MR. AZAM ISHMAEL:** I don't think we make the
12 assumption that these people are not going to stay within the
13 country or participate in political affairs. We make the
14 assumption that we want to have an inclusive process that
15 welcomes new people into the fold. That's why 14 years are
16 allowed to vote. That's why, you know, we have open rules,
17 open and inclusive rules.

18 **MR. FRASER HARLAND:** Right. But you've just
19 said that someone who is only here for a year, provided they
20 can prove their address, would be able to vote, and could
21 vote in a nomination; correct?

22 **MR. AZAM ISHMAEL:** Correct. Yes.

23 **MR. FRASER HARLAND:** Okay. And does that not
24 create any concern for the Liberal Party about potential
25 coercion or foreign interference with an international -- a
26 group of international students voting in a nomination
27 contest?

28 **MR. AZAM ISHMAEL:** I don't think that that

1 creates any concern because the idea is that the ballot box
2 is still a secret ballot placed and marked at a local
3 nomination meeting.

4 **MR. FRASER HARLAND:** And you had said that in
5 order to vote in a nomination contest, you have to be a
6 resident in the electoral district; correct?

7 **MR. AZAM ISHMAEL:** Correct.

8 **MR. FRASER HARLAND:** And so you'd agree that
9 if a candidate were to bus people in from outside of the
10 riding to vote, then that would be a violation of your
11 party's rules; correct?

12 **MR. AZAM ISHMAEL:** Just the simple fact that
13 the bus met outside of the riding would not be a violation of
14 the rules, no.

15 **MR. FRASER HARLAND:** No, but if the voters
16 were not resident in the electoral district and were resident
17 in a different riding, that would be contrary to the rules;
18 correct?

19 **MR. AZAM ISHMAEL:** Correct.

20 **MR. FRASER HARLAND:** And if voters were to
21 use documentation to prove their address that was not real,
22 was forged or fraudulent in some way, that would also be
23 contrary to your party's rules; correct?

24 **MR. AZAM ISHMAEL:** Correct.

25 **MR. FRASER HARLAND:** The National Campaign
26 Chair has the power to remove a nominee in the best interests
27 of the party? Is that correct?

28 **MR. AZAM ISHMAEL:** Correct.

1 **MR. FRASER HARLAND:** And the leader of the
2 party can also choose not to endorse any nominee?

3 **MR. AZAM ISHMAEL:** As per the *Canada*
4 *Elections Act*, yes.

5 **MR. FRASER HARLAND:** If there was evidence of
6 bringing someone from outside of the riding, who lived
7 outside of the riding, to vote, could that be grounds for the
8 removal of a nominee?

9 **MR. AZAM ISHMAEL:** That would be a matter for
10 the Appeals Committee of the party to decide.

11 **MR. FRASER HARLAND:** And the same rules for
12 voting in the nomination -- I'll put it this way, if you're a
13 member of the party, you can vote in a leadership contest as
14 well? Is that correct?

15 **MR. AZAM ISHMAEL:** That is correct, yes.

16 **MR. FRASER HARLAND:** All registered Liberals
17 can vote in leadership contests?

18 **MR. AZAM ISHMAEL:** Correct.

19 **MR. FRASER HARLAND:** So that would mean that
20 ---

21 **MR. AZAM ISHMAEL:** Assuming -- well, I should
22 actually restate that. The rules for the leader -- next
23 leadership campaign have not been written. They're written
24 in advance of the campaign. But, you know, in a broad scope,
25 yes.

26 **MR. FRASER HARLAND:** But for previous ---

27 **MR. AZAM ISHMAEL:** Yes.

28 **MR. FRASER HARLAND:** --- leadership contests?

1 Yeah. So that would mean international students, again,
2 provided they can demonstrate they're an ordinarily resident
3 in Canada, could vote in a leadership contest as well;
4 correct?

5 **MR. AZAM ISHMAEL:** As long as they meet
6 whatever criteria set out in the rules for the selection of
7 the leader.

8 **MR. FRASER HARLAND:** Okay. I'd like to ask a
9 few questions about the nomination in Don Valley North. I
10 understand that your position is that no irregularities took
11 place in the 2019 Don Valley North Nomination Contest? Is
12 that correct?

13 **MR. AZAM ISHMAEL:** As far as I'm aware, yes.

14 **MR. FRASER HARLAND:** You're aware, I assume,
15 of Special Rapporteur David Johnston's Report on Foreign
16 Interference?

17 **MR. AZAM ISHMAEL:** Yes.

18 **MR. FRASER HARLAND:** And in his report, his
19 found that irregularities were observed with Mr. Dong's
20 nomination and there's well-grounded suspicion that the
21 irregularities were tied to the PRC Consulate in Toronto?
22 Are you aware of that?

23 **MR. AZAM ISHMAEL:** I didn't read that
24 specific passage of his report, but generally speaking, yes.

25 **MR. FRASER HARLAND:** Do you disagree with Mr.
26 Johnston's conclusion then?

27 **MR. AZAM ISHMAEL:** I don't know what Mr.
28 Johnston drew that conclusion upon, so it would be hard for

1 me to disagree with it.

2 MS. LAURA DOUGAN: Could you put the passage
3 to the witness?

4 COMMISSIONER HOGUE: Excuse me, I don't hear
5 anything. Can you speak louder, please?

6 MS. LAURA DOUGAN: Could you put the passage
7 to the witness?

8 COMMISSIONER HOGUE: Do we have the document
9 ---

10 MR. FRASER HARLAND: I ---

11 COMMISSIONER HOGUE: --- at hand or ---

12 MR. FRASER HARLAND: --- I can bring it up.
13 I'm just also aware of my time, Commissioner, but it is COM-
14 0000104, and it's on page 23, at the bottom right. It's
15 probably 23 of the document, not of the PDF, so I -- yeah.

16 --- EXHIBIT No./PIÈCE No. COM 104:

17 First Report - Independent Special
18 Rapporteur on Foreign Interference

19 COMMISSIONER HOGUE: Yeah, it is.

20 MR. FRASER HARLAND: So just that bottom
21 right, the last paragraph there, Mr. Ishmael, was the one I
22 was referring to.

23 MR. AZAM ISHMAEL: Okay.

24 MR. FRASER HARLAND: So I take it your answer
25 is you're not ---

26 MR. AZAM ISHMAEL: Yeah, I still don't know
27 what Mr. Johnston used to draw his conclusion, but if Mr.
28 Johnston wrote that, I'm sure that's the way he feels.

1 **MR. FRASER HARLAND:** And are you aware that
2 the Commissioner of Canada Elections has an ongoing
3 investigation into the 2019 nomination of Don Valley North?

4 **MR. AZAM ISHMAEL:** No, I'm not aware of it.

5 **MR. FRASER HARLAND:** Okay. Well, we heard
6 that from the Commissioner last week, and so I'm wondering,
7 in light of the Johnston report and an ongoing Commissioner
8 investigation if the Liberal Party has conducted its own
9 internal investigation into the Don Valley North nomination?

10 **MR. AZAM ISHMAEL:** When media reports
11 surfaced in regards to this nomination, we did, you know,
12 refer to the meeting chair, and ask him if he had seen or
13 heard or any -- anything irregular, and the response back we
14 got was that he hadn't noticed anything irregular, and he was
15 an experienced, very experienced volunteer with the Liberal
16 Party, so we took his word.

17 **MR. FRASER HARLAND:** In that case, I'm
18 wondering if you can say why Mr. Dong is not in the Liberal
19 caucus currently.

20 **MR. AZAM ISHMAEL:** I can't speak to that.

21 **MR. FRASER HARLAND:** Okay. Those are my
22 questions, Commissioner.

23 **COMMISSIONER HOGUE:** Thank you.

24 So the next one is counsel for Jenny Kwan.

25 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

26 **MR. SUJIT CHOUDHRY:**

27 **MR. SUJIT CHOUDHRY:** Good morning,
28 Commissioner. For the record, my name is Sujit Choudhry.

1 I'm counsel to Jenny Kwan. I just have a few questions for
2 the panel. I'm sorry if this seems a little bit repetitive.

3 So, Ms. McGrath, just a couple of questions
4 arising out of your testimony this morning if I could. So I
5 recall that the Commission counsel asked you about the
6 complaint sent to OCCE in September 2021 ---

7 **MS. ANNE McGRATH:** M'hm.

8 **MR. SUJIT CHOUDHRY:** --- in relation to
9 Vancouver East. And I believe you, as part of your answer,
10 you might have said that you understood that the complaint
11 wasn't a very high priority?

12 **MS. ANNE McGRATH:** If we're in -- with
13 respect to the SITE Task Force and foreign interference in
14 the election.

15 **MR. SUJIT CHOUDHRY:** Oh, I see, but not that
16 it was not a high priority for OCCE?

17 **MS. ANNE McGRATH:** Yeah.

18 **MR. SUJIT CHOUDHRY:** Okay. And so when you
19 said you understood it wasn't a high priority, you were told
20 that at the SITE Task Force?

21 **MS. ANNE McGRATH:** Well, it didn't come up at
22 the SITE Task Force.

23 **MR. SUJIT CHOUDHRY:** I see. Okay. Okay.

24 **MS. ANNE McGRATH:** Which is my -- what I base
25 that on.

26 **MR. SUJIT CHOUDHRY:** Right. Thanks for
27 clarifying. Very much appreciate it.

28 So I just want to go back, and this is a

1 question now to all the witnesses, and so it's -- you've all
2 testified that you received very little or almost no specific
3 information at the SITE Task Force meetings. Could you each
4 confirm that that includes, and, I'm sorry, but I just would
5 like to get this on the record, that you received no specific
6 information about riding level concerns regarding foreign
7 interference. Maybe we can start with Ms. McGrath.

8 **MS. ANNE McGRATH:** That's correct, yes.

9 **MR. SUJIT CHOUDHRY:** Mr. Ishmael?

10 **MR. AZAM ISHMAEL:** As a general statement
11 without revealing the contents of the briefing ---

12 **MR. SUJIT CHOUDHRY:** Of course.

13 **MR. AZAM ISHMAEL:** --- I'd say that's
14 correct.

15 **MR. SUJIT CHOUDHRY:** Yeah. Mr. Soliman?

16 **MR. WALIED SOLIMAN:** Correct.

17 **MR. SUJIT CHOUDHRY:** Okay. Thank you. And
18 so part of the Commission's mandate is to look at the future
19 and to figure out what the system should look like. So I'd
20 like to ask you a couple of questions to get your responses
21 on that, if I may, to assist the Commissioner. And so one of
22 the issues I think that we're going to need to look at is how
23 political parties interact with the SITE Task Force in, for
24 example, the forthcoming election. And so would you agree
25 that political parties should receive actionable riding level
26 information regarding foreign interference on the SITE Task
27 Force. Let me just start with Ms. McGrath.

28 **MS. ANNE McGRATH:** I do believe that because

1 that's -- that seems to me to be the purpose, is to be able
2 to do something about this, so you would require riding level
3 specific information and a course of action.

4 **MR. SUJIT CHOUDHRY:** And if I could just
5 follow up, and do you think that parties should be able to
6 act on that information within the scope of their legal
7 authority?

8 **MS. ANNE McGRATH:** Within the scope of their
9 legal authority, but we are not security agencies. We're
10 political parties, and so I believe that the security and
11 intelligence grouping would be the best place for that to be
12 dealt with.

13 **MR. SUJIT CHOUDHRY:** Okay. Mr. Soliman,
14 would you like me to repeat the questions, or do you recall
15 them?

16 **MR. WALIED SOLIMAN:** I got them.

17 **MR. SUJIT CHOUDHRY:** Could you please give
18 your answers, sir?

19 **MR. WALIED SOLIMAN:** I agree. I
20 wholeheartedly agree with Ms. McGrath.

21 **MR. SUJIT CHOUDHRY:** Okay. And, Mr. Ishmael,
22 could you please provide your answers to those two questions?

23 **MR. AZAM ISHMAEL:** Yeah, I agree with Ms.
24 McGrath, but I do -- I don't envy the position that the SITE
25 Task Force is in, where they're trying to -- you know, these
26 attempts are happening in real time and they need to be able
27 to declassify things and not compromise a longer term, so I
28 empathize with the challenge they have, but actionable

1 intelligence is definitely something we'd request.

2 **MR. SUJIT CHOUDHRY:** So the last question I
3 want to ask is about institutional fragmentation, so there's
4 a bit of an alphabet soup of different actors and
5 institutions within the federal government that is involved
6 in foreign intelligence. We've heard about the CSIS, the
7 RCMP, CSC, GAC, OCCE, Elections Canada. In fact, there's
8 over a dozen. And so I'm wondering if -- I'm going to ask
9 each of you again, to what extent do you think institutional
10 fragmentation is a problem in respect to detecting, deterring
11 and countering foreign interference and how might that be
12 best addressed by the Commissioner in her recommendations.

13 **MS. ANNE McGRATH:** That's a hard one to
14 answer actually because, you know, I'm not a part of any of
15 those agencies and I don't know what their -- what that is,
16 but I will say, as I've said before, that there were a lot of
17 resources devoted to this and a lot of key players at it, and
18 it seems to me that perhaps fewer people with more
19 information and more direction would have been more useful.

20 **MR. SUJIT CHOUDHRY:** Okay. Mr. Soliman?
21 Oh, I'm sorry, I can't hear you, sir.

22 **MR. WALIED SOLIMAN:** I agree with that. I
23 have no view on the fragmentation issue.

24 **MR. SUJIT CHOUDHRY:** Yeah, and, Mr. Ishmael?

25 **MR. AZAM ISHMAEL:** I'd agree. I don't have a
26 view on the fragmentation issue, but it does appear that the
27 SITE Task Force would be an attempt at unifying that.

28 **MR. SUJIT CHOUDHRY:** Okay. Thank you very

1 much.

2 **COMMISSIONER HOGUE:** Thank you. Next one is
3 counsel for Han Dong.

4 **MR. JEFFREY WANG:** No questions.

5 **COMMISSIONER HOGUE:** No question?

6 **MR. JEFFREY WANG:** No.

7 **COMMISSIONER HOGUE:** Counsel for the
8 Conservative Party, Me De Luca?

9 **MR. NANDO de LUCA:** Just give me a second.

10 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

11 **MR. NANDO de LUCA:**

12 **MR. NANDO de LUCA:** First question is for Mr.
13 Ishmael. Can you tell us who Braeden Caley is?

14 **MR. AZAM ISHMAEL:** He was the former Senior
15 Director of Communications for Liberal Party of Canada.

16 **MR. NANDO de LUCA:** Okay. And am I correct
17 that at least since 2000 and -- the 2019 election he was an
18 employee of the Liberal Party of Canada?

19 **MR. AZAM ISHMAEL:** Correct.

20 **MR. NANDO de LUCA:** Okay. And he was not an
21 employee of the Government of Canada?

22 **MR. AZAM ISHMAEL:** Correct.

23 **MR. NANDO de LUCA:** And you are an employee
24 of the Liberal Party of Canada, sir?

25 **MR. AZAM ISHMAEL:** Correct. Well, the
26 Federal Liberal Agency of Canada is the corporate name.

27 **MR. NANDO de LUCA:** Okay. And you're not an
28 employee of the Government of Canada?

1 **MR. AZAM ISHMAEL:** Correct.

2 **MR. NANDO de LUCA:** Okay. And that's always
3 been the case? Have you ever been an employee of the
4 Government of Canada?

5 **MR. AZAM ISHMAEL:** No.

6 **MR. NANDO de LUCA:** Can I ask, please, that
7 document number CAN doc 000013 be pulled up, please? And
8 perhaps just scroll down to the second page.

9 **--- EXHIBIT No./PIÈCE No. CAN.DOC 13:**

10 Institutional Report - Prime
11 Minister's Office

12 **MR. NANDO de LUCA:** Mr. Ishmael, I understand
13 that this is an institutional report prepared by or on behalf
14 of the Prime Minister's Office for the purpose of the present
15 inquiry. I'd ask that you or someone scroll down to page 8,
16 please? And you'll see there is a heading there that's
17 entitled "Relevant Oral Briefings to the Prime Minister and
18 the PMO"; do you see that?

19 **MR. AZAM ISHMAEL:** Yes.

20 **MR. NANDO de LUCA:** Okay. And then there's a
21 summary of the various meetings that the intelligence agency
22 or agencies gave to the PMO's office; do you see that?
23 Perhaps you can scroll down some more. Okay. And next page
24 as well.

25 I'd like to direct your attention to two
26 separate briefings, the first, the September 28 to 29, 2019.

27 The second is September 12th, 2021. Do you
28 see those?

1 **MR. AZAM ISHMAEL:** Yes.

2 **MR. NANDO de LUCA:** And am I correct that
3 each of those briefings were during the respective 43rd and
4 44th General Election writ periods?

5 **MR. AZAM ISHMAEL:** Correct.

6 **MR. NANDO de LUCA:** And if you look at the
7 notes section -- actually, for those two rows, all of the
8 columns, it indicates that on both of those occasions that
9 I've pointed you to, officials from CSIS and the PCO gave
10 briefings that were intended for the Prime Minister
11 specifically in his capacity as leader of the Liberal Party
12 of Canada. Do you see that?

13 **MR. AZAM ISHMAEL:** I don't see that, no.

14 **MR. NANDO de LUCA:** Okay. The fourth row,
15 sir, under the notes section. You see that?

16 **MR. AZAM ISHMAEL:** On the first meeting, yes.

17 **MR. NANDO de LUCA:** Okay. And on the second
18 meeting, you're drawing a distinction because it doesn't
19 indicate that they were for the benefit of the Prime
20 Minister?

21 **MR. AZAM ISHMAEL:** Correct.

22 **MR. NANDO de LUCA:** Okay. But you'll agree
23 with me that with respect to the second meeting on September
24 12, 2021 they were delivered for the purposes to the
25 representatives of the Liberal Party of Canada?

26 **MR. AZAM ISHMAEL:** Correct.

27 **MR. NANDO de LUCA:** Okay. And am I correct
28 that on both occasions it was you and/or Mr. Caley who were

1 the intermediaries who were briefed directly by the PCO and
2 CSIS and who were then charged in communicating the
3 information to either the Prime Minister or other Liberal
4 Party of Canada representatives?

5 **MR. AZAM ISHMAEL:** We were briefed with the
6 information and then we were told to do with it as we will.

7 **MR. NANDO de LUCA:** Okay. And at least for
8 the first meeting in 2019, that was specifically for the
9 benefit of the leader of the Liberal Party of Canada at the
10 time?

11 **MR. AZAM ISHMAEL:** Without going into the
12 specificity of the meeting, I don't recall that the intention
13 was to brief the Prime Minister.

14 **MR. NANDO de LUCA:** Sorry. I missed the last
15 part of that.

16 You don't recall...?

17 **MR. AZAM ISHMAEL:** I don't recall that they
18 said this information is for the Prime Minister of Canada.

19 **MR. NANDO de LUCA:** Okay. And so if you
20 could scroll up, are you suggesting that whoever prepared
21 this institutional report is mistaken there when it says this
22 was a briefing delivered to the Prime Minister of Canada in
23 his capacity of leader of the Liberal Party of Canada?

24 **MR. AZAM ISHMAEL:** No, that note reads
25 correct, that it was a briefing delivered to the Prime
26 Minister in his capacity as leader of the Liberal Party of
27 Canada.

28 **MR. NANDO de LUCA:** Okay. And am I correct

1 that with respect to these two meetings, you and/or Mr. Caley
2 were the intermediaries as opposed to members of the PMO's
3 office on the other occasions because on those occasions, the
4 information was being communicated specifically for the
5 political interest as opposed to the government interest?

6 **MR. AZAM ISHMAEL:** I can't speak to why we
7 were chosen. We were the members of the SITE committee and
8 my understanding is we held those -- we had those meetings as
9 member of the SITE committee ---

10 **MR. NANDO de LUCA:** Okay.

11 **MR. AZAM ISHMAEL:** --- or the SITE Task Force
12 mandate.

13 **MR. NANDO de LUCA:** Okay. The next questions
14 are for Mr. Soliman and Ms. McGrath.

15 Are either of you aware of ---

16 **COMMISSIONER HOGUE:** I am asked to tell you
17 just to go a bit more slowly.

18 **MR. NANDO de LUCA:** Okay. You'll be -- just
19 trying to finish. I'm sorry.

20 The next questions are for Mr. Soliman and
21 Ms. McGrath, and they are this.

22 Are either of you aware of instances during
23 the writ periods for either the 43rd or 44th General
24 Elections where the Privy Council Office or CSIS provided
25 briefings on foreign interference to the CPC and the NDP in
26 their capacity as political parties?

27 **MS. ANNE McGRATH:** Do you want me to start?

28 **MR. NANDO de LUCA:** Sure.

1 **MS. ANNE McGRATH:** I would say that the -- I
2 was there as a member of the NDP, yes.

3 **MR. NANDO de LUCA:** On a one-on-one basis?

4 **MS. ANNE McGRATH:** Not on a one-on-one basis,
5 no.

6 **MR. NANDO de LUCA:** Mr. Soliman?

7 **MR. WALIED SOLIMAN:** Same as Ms. McGrath,
8 except just there for the CPC. No one on one.

9 **MR. NANDO de LUCA:** Those are my questions.

10 **COMMISSIONER HOGUE:** Thank you.

11 **MR. NANDO de LUCA:** Thank you very much.

12 **COMMISSIONER HOGUE:** So next one is counsel
13 for the Sikh Coalition.

14 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

15 **MR. PRABJOT SINGH:**

16 **MR. PRABJOT SINGH:** Good morning,
17 Commissioner. It's Prabjot Singh, counsel for Sikh
18 Coalition.

19 Mr. Soliman, if you don't mind, if I can
20 start with yourself, based on the testimony that you shared
21 with my friend this morning, I think -- is it fair to say
22 that you're not an expert in, you know, security and
23 intelligence, analyzing that kind of information?

24 **MR. WALIED SOLIMAN:** Correct.

25 **MR. PRABJOT SINGH:** So you're relying on any
26 information and advice that was provided to you by security
27 and intelligence during those site meetings; correct?

28 **MR. WALIED SOLIMAN:** Correct.

1 **MR. PRABJOT SINGH:** And so in your political
2 experience, your career, you've been involved in the
3 Conservative Party for a number of years at the provincial
4 and federal levels; correct?

5 **MR. WALIED SOLIMAN:** Correct.

6 **MR. PRABJOT SINGH:** And so during that period
7 of time, I would imagine that you would be engaging with a
8 number of stakeholders from business interests, labour
9 unions, ethnic, cultural groups?

10 **MR. WALIED SOLIMAN:** Correct.

11 **MR. PRABJOT SINGH:** And in any engagements
12 with stakeholders who identified as Indian, in your
13 experience or that of your colleagues, I would imagine that
14 you were engaging with Canada-based diaspora organizations as
15 well as officials from the Indian Consulate as well. Is that
16 correct?

17 **MR. WALIED SOLIMAN:** I don't recall ever
18 engaging with people from the consulate, but from diaspora
19 organizations, yes.

20 **MR. PRABJOT SINGH:** Do you recall during your
21 time with the Conservative Party of officials from the Indian
22 Consulate interacting or communicating with your colleagues?

23 **MR. WALIED SOLIMAN:** I was not involved in
24 the day-to-day side. I'm not aware.

25 **MR. PRABJOT SINGH:** And so you don't know of
26 any communications with your -- with any of your colleagues.
27 Is that correct?

28 **MR. WALIED SOLIMAN:** I don't have any

1 information on that.

2 **MR. PRABJOT SINGH:** Okay. As a part of one
3 of your roles within the Conservative Party, I would imagine
4 that you were involved with the screening and vetting of
5 potential candidates at the nomination stage. Is that fair?

6 **MR. WALIED SOLIMAN:** That was not one of my
7 day-to-day jobs, no. I was not on that committee.

8 **MR. PRABJOT SINGH:** Would you have any
9 capacity or involvement in any of those conversations?

10 **MR. WALIED SOLIMAN:** Not in the 2021
11 campaign, no.

12 **MR. PRABJOT SINGH:** What about at any point
13 in your political career at the provincial level or the
14 federal level?

15 **MR. WALIED SOLIMAN:** At the provincial level,
16 yes.

17 **MR. PRABJOT SINGH:** And in your experience,
18 were there examples where Indian stakeholders communicated
19 enthusiastic support or opposition to a proposed candidate?

20 **MR. WALIED SOLIMAN:** Not in any manner that I
21 felt was more or less enthusiastic than sort of other -- than
22 other communities in a nomination race.

23 **MR. PRABJOT SINGH:** Sure, yeah. That
24 sentiment was communicated.

25 **MR. WALIED SOLIMAN:** Correct.

26 **MR. PRABJOT SINGH:** And you have witnessed or
27 experienced examples where your Party was pressured to
28 redlight certain candidates at certain times; correct?

1 **MR. WALIED SOLIMAN:** There may have been. I
2 don't -- certainly nothing in connection with the subject
3 elections that we're talking about here.

4 **MR. PRABJOT SINGH:** Sure. I'm just -- I'm
5 trying to get context to understand pattern which will go to,
6 you know, for the weight and credibility of evidence that the
7 Commission will be hearing.

8 **MR. WALIED SOLIMAN:** Yeah. Not in connection
9 -- not in connection with the 2021 election that's the
10 subject matter of this discussion.

11 **MR. PRABJOT SINGH:** So that's to say that
12 there may have been other examples outside of these two
13 federal elections.

14 **MR. WALIED SOLIMAN:** I'm here to talk about
15 this in my capacity as the co-chair of the 2021 campaign.

16 **MR. PRABJOT SINGH:** Okay. So am I taking it
17 that you -- that's not a question that you would like to
18 answer?

19 **MR. WALIED SOLIMAN:** No. It's just not the
20 remit, I don't believe, of this committee. This committee is
21 to take a look at the 2021 and the 2019 elections. And in
22 connection with the 2021 election, I did not come across
23 anything of that nature.

24 **MR. PRABJOT SINGH:** Mr. Operator, if we can
25 bring up document CAN 018041. The bottom of page 4.

26 Now, Mr. Soliman, at the bottom of this
27 briefing that my friend referred you to earlier, the notes
28 from the site meeting note India is actively conducting

1 foreign interference and targets Canadian political figures
2 working through Indian officials and:

3 "...engages in a range of activities
4 that seek to influence Canadian
5 communities and politicians in order
6 to advance its political interests."

7 And that:

8 "India is interested in engaging its
9 diaspora in Canada to shape political
10 outcomes in its favour."

11 Do you recall getting this briefing at any
12 time in your meetings with SITE?

13 **MR. WALIED SOLIMAN:** Same issue as per
14 previous answers. We never received this document and while
15 India would have been mentioned, it would not have been with
16 this level of specificity.

17 **MR. PRABJOT SINGH:** And if you did receive
18 this level of specificity, would that have impacted how you
19 would have viewed the landscape and reacted?

20 **MR. WALIED SOLIMAN:** As per -- similar to my
21 previous answers, yes.

22 **MR. PRABJOT SINGH:** Okay. Thank you,
23 Mr. Soliman.

24 **MR. WALIED SOLIMAN:** Thank you.

25 **MR. PRABJOT SINGH:** Ms. McGrath, if I can
26 turn to you. Is it true that the leader of the federal NDP,
27 Mr. Jagmeet Singh, has been targeted by disinformation since
28 his appointment as leader in 2017, which would include the

1 2019 and 2021 elections?

2 **MS. ANNE McGRATH:** Yes, that would be
3 correct.

4 **MR. PRABJOT SINGH:** And is it your
5 understanding or observation that a lot of that
6 disinformation emanates from Indian media sources and online
7 networks?

8 **MS. ANNE McGRATH:** The ones that I'm familiar
9 with have been primarily through that -- those -- the Indian
10 media network, yeah.

11 **MR. PRABJOT SINGH:** And is one of those
12 pieces of disinformation alleged that Mr. Singh is involved
13 in some global conspiracy around the pandemic that was
14 mutually amplified by Canadian outlets as well?

15 **MS. ANNE McGRATH:** I have seen those, yes.

16 **MR. PRABJOT SINGH:** And not to get into the
17 weeds, but one of the other targeted messages is that
18 Mr. Singh is himself a so-called extremist or has some kind
19 of sympathies for extremism. That's one of the targeted
20 messages; correct?

21 **MS. ANNE McGRATH:** Yes.

22 **MR. PRABJOT SINGH:** And Mr. Singh's not
23 actually an extremist.

24 **MS. ANNE McGRATH:** He has not been involved
25 in any of the things that have been alleged through those
26 sources.

27 **MR. PRABJOT SINGH:** He has been critical of
28 India's human rights violations, including its role in

1 perpetrating genocide; correct?

2 **MS. ANNE McGRATH:** Yes, he has.

3 **MR. PRABJOT SINGH:** And is that a plausible
4 reason why you think he may be targeted?

5 **MS. ANNE McGRATH:** I think that that is a
6 plausible reason, and the fact that he is -- he has roots in
7 that area.

8 **MR. PRABJOT SINGH:** And so aside from
9 disinformation, is it true that Mr. Singh was also denied a
10 visa to visit India?

11 **MS. ANNE McGRATH:** Yes, that's right.

12 **MR. PRABJOT SINGH:** And based on media
13 reports, is it your understanding that that's because of his
14 human rights advocacy?

15 **MS. ANNE McGRATH:** I believe that's the case,
16 yes.

17 **MR. PRABJOT SINGH:** So naturally that would
18 have a broader chilling impact on the community, I would
19 imagine. Is it your understanding that since Mr. Singh's
20 appointment in 2017, that members of the Sikh community feel
21 a sense of fear or unease in supporting the NDP because of
22 fear of reprisal by India?

23 **MS. ANNE McGRATH:** Yes.

24 **MR. PRABJOT SINGH:** After Prime
25 Minister Trudeau's announcement in September about India's
26 role in the assassination of a Sikh leader, are you aware of
27 media reports that members of the Sikh community have
28 received warnings by the RCMP that they are facing a threat

1 to their lives? Without disclosing the source of those
2 threats.

3 **MS. ANNE McGRATH:** I've seen reports to that
4 effect, yes.

5 **MR. PRABJOT SINGH:** And Mr. Singh also
6 received a similar report and a warning that he was facing a
7 potential threat to his life. Without any details on the
8 source. Is that correct?

9 **MS. ANNE McGRATH:** I can't speak to that.

10 **MR. PRABJOT SINGH:** And is that for reasons
11 of national security confidentiality?

12 **MS. ANNE McGRATH:** Yes.

13 **MR. PRABJOT SINGH:** I would imagine that you
14 -- well, you may not be able to answer this question, but is
15 it true that Mr. Singh has been provided a security detail
16 because of a potential threat to his life?

17 **MS. ANNE McGRATH:** I can't comment on
18 security arrangements.

19 **MR. PRABJOT SINGH:** Is it your understanding
20 that members of the NDP's staff who come from the Sikh
21 community feel an elevated risk emanating from India because
22 of their work with the NDP?

23 **MS. ANNE McGRATH:** I have been told that by
24 some people, yes.

25 **MR. PRABJOT SINGH:** And is it true that new
26 members of staff from Sikh community, during their
27 onboarding, they are often warned about the possibilities of
28 being denied a visa or other repercussions emanating from

1 India? Correct?

2 **MS. ANNE McGRATH:** Correct.

3 **MR. PRABJOT SINGH:** And so in this picture
4 that you have painted from 2017, that covers both of two
5 previous electoral periods, what impacts do you think this
6 has on Canada's electoral process and democratic institutions
7 when a racialized community, many of whom have fled religious
8 and political persecution from another country, feel that
9 same intimidation and persecution for their engagement in
10 Canadian politics in supporting their Canadian political
11 party?

12 **MS. ANNE McGRATH:** I believe that for several
13 diaspora groups that there are concerns about the
14 ramifications of involvement in political activity in Canada.

15 **MR. PRABJOT SINGH:** Thank you for your time.
16 Thank you, Madam Commissioner.

17 **COMMISSIONER HOGUE:** Thank you.

18 So next one is counsel for the RCDA,
19 M. Sirois.

20 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIR PAR**

21 **MR. GUILLAUME SIROIS:**

22 **MR. GUILLAUME SIROIS:** Good morning. I'm
23 Guillaume Sirois, counsel for the Russian Canadian Democratic
24 Alliance. My questions will be directed mostly to
25 Mr. Soliman today.

26 I'd like to pull out RCD 00009, please.

27 **--- EXHIBIT No./PIÈCE No. RCD 9:**

28 Tweet by Walied Soliman - 17 February

1 2023

2 **COURT OPERATOR:** Repeat that, please.

3 **MR. GUILLAUME SIROIS:** RCD 0009.

4 So this is a series of posts from you,
5 Mr. Soliman. Do you recognise these?

6 **MR. WALIED SOLIMAN:** Yes.

7 **MR. GUILLAUME SIROIS:** They were posted on a
8 platform X on February 17, 2023.

9 Would like to go to the last post of the
10 chain, please.

11 So am I correct in understanding that these
12 posts concern your disappointment regarding the SITE Task
13 Force work during the 2021 general election?

14 **MR. WALIED SOLIMAN:** Sorry, can you repeat
15 the question?

16 **MR. GUILLAUME SIROIS:** These posts concern
17 your disappointment regarding the SITE Task Force work during
18 the 2021 general election.

19 **MR. WALIED SOLIMAN:** So these posts were made
20 either the day after or the day of media reports confirming
21 that in fact there were issues in the 2019 election. So they
22 were done at that point recalling the experience in 2021.

23 **MR. GUILLAUME SIROIS:** So these posts,
24 although they were made in the context of allegations
25 concerning the 2019 elections, they concern your
26 disappointment regarding the task force work during the 2021
27 election. Is that right?

28 **MR. WALIED SOLIMAN:** Principally, because we

1 didn't hear about the issues in 2019 in 2021, which would
2 have been consequential, as my colleagues and I have
3 expressed.

4 **MR. GUILLAUME SIROIS:** Understood. I would
5 read to you the last post of that chain. It reads.

6 "In a final call, we told them..."

7 Being the task force:

8 "...that our security establishment
9 had clearly failed our democracy.

10 Political parties cannot formulate
11 public policy under threat that they
12 are going to lose ridings based on
13 foreign interference because of a
14 weak security establishment."

15 Do you stand by this statement today?

16 **MR. WALIED SOLIMAN:** Yes.

17 **MR. GUILLAUME SIROIS:** I will now turn to the
18 other panelists.

19 Ms. McGrath first. Do you agree with the
20 statement made by Mr. Soliman?

21 **MS. ANNE McGRATH:** I believe that that's
22 actually the focus of this Public Inquiry, and that -- that
23 that will be determined through the process of Inquiry, and
24 recommendations for how to improve it will come from this.

25 **MR. GUILLAUME SIROIS:** Mr. Ishmael, do you
26 have something to add?

27 **MR. AZAM ISHMAEL:** No, I'd agree with
28 Ms. McGrath's statement.

1 **MR. GUILLAUME SIROIS:** Okay. So turning back
2 to you, Mr. Soliman. I understand that one of your concerns
3 that you discussed today is that you were not presented with,
4 like, specific or actionable information regarding foreign
5 interference during the 2021 election. Is that correct?

6 **MR. WALIED SOLIMAN:** Correct.

7 **MR. GUILLAUME SIROIS:** And that's part of
8 your complaint on these posts?

9 **MR. WALIED SOLIMAN:** My principal complaint
10 is that two years after the election I learned from a news
11 story, from the Globe and Mail, that information we had
12 received in 2021, was inconsistent -- relating to the threat
13 level in 2019, was inconsistent with what we were told at
14 that time. So yes, was I frustrated? Absolutely.

15 **MR. GUILLAUME SIROIS:** That -- so that made
16 you believe that the threat level in 2021 may be as well
17 inconsistent with what information was publicly disclosed or
18 that you received?

19 **MR. WALIED SOLIMAN:** I didn't know. I don't
20 know that. What I knew on February 17, 2023, is that there
21 was a threat in 2019 that was not disclosed to us in 2021.

22 **MR. GUILLAUME SIROIS:** And one last question:
23 I want to know if you received any specific information
24 regarding Russian interference in the 2021 election. And
25 that's addressed to all the panelists, but maybe we can start
26 with you, Mr. Soliman.

27 **MR. WALIED SOLIMAN:** Okay. I don't -- you
28 know, we didn't get anything that was actually that

1 interesting. So no. I wish I could tell you we had
2 something. No.

3 **MS. ANNE McGRATH:** Yes, not through the SITE
4 Taskforce, no.

5 **MR. GUILLAUME SIROIS:** And any other
6 governmental bodies?

7 **MS. ANNE McGRATH:** No.

8 **MR. GUILLAUME SIROIS:** And Mr. Ishmael?

9 **MR. AZAM ISHMAEL:** I'd agree with Ms.
10 McGrath's statement.

11 **MR. GUILLAUME SIROIS:** All right. Thank you.

12 **COMMISSIONER HOGUE:** Thank you. Next one is
13 counsel for Human Rights Coalition.

14 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

15 **MS. SARA TEICH:**

16 **MS. SARAH TEICH:** Good afternoon. I'm going
17 to direct all my questions to Mr. Ishmael.

18 I want to dig a bit more into the permanent
19 appeals process. Who may commence an appeal using this
20 process?

21 **MR. AZAM ISHMAEL:** So it would be people who
22 are party to a decision.

23 **MS. SARAH TEICH:** What does that mean, party
24 to a decision?

25 **MR. AZAM ISHMAEL:** So I don't know, if you're
26 in a nomination contest, you know, the opposing candidate,
27 the winning candidate, somebody who feels, you know, the
28 Permanent Appeals has a very broad mandate to review any

1 decision of the party. So, you know, could be anybody who is
2 interested within the party to access it.

3 **MS. SARAH TEICH:** Would a voter or a
4 potential voter be able to access the mechanism?

5 **MR. AZAM ISHMAEL:** To be honest, I mean, I've
6 never seen a case like that. It would be up to the Permanent
7 Appeals Committee to decide if they had standing or not.

8 **MS. SARAH TEICH:** So it would be at the
9 discretion of the Committee?

10 **MR. AZAM ISHMAEL:** Correct.

11 **MS. SARAH TEICH:** Okay. How are voters or
12 potential voters supposed to know that they can at least ask
13 to access this mechanism?

14 **MR. AZAM ISHMAEL:** Well, voters on an
15 individual basis, you know, the Liberal Party of Canada
16 operates very transparently with the documents on the Liberal
17 Party of Canada and, you know, as stated, the nomination
18 rules are there as well for people to view. And then we have
19 other methods.

20 So if somebody were to reach out with a
21 concern, I'd put it in a more broad-based area. If someone
22 had an area of concern, they could reach out to the party and
23 the party would make a decision one way or another.

24 **MS. SARAH TEICH:** How would they know who to
25 reach out to within the party?

26 **MR. AZAM ISHMAEL:** You'd be surprised. A lot
27 of people reach out to the Liberal Party, and a number of
28 methods, including using just our general inboxes. You know,

1 when I give presentations, you know, oftentimes I end with my
2 personal email and my personal cellphone number. But, you
3 know, there's lots of different ways to reach out to a party.

4 **MS. SARAH TEICH:** If someone reaches out
5 either to you, or through one of these various mechanisms,
6 would complainants be provided with confidentiality
7 protections to make a complaint?

8 **MR. AZAM ISHMAEL:** As a general rule, yes.

9 **MS. SARAH TEICH:** What kind of
10 confidentiality protections?

11 **MR. AZAM ISHMAEL:** I think it depends on the
12 nature of the complaint.

13 **MS. SARAH TEICH:** If, for example, a voter or
14 potential voter feels they were coerced to vote for Mr. Dong,
15 for example, what kind of protections would be available?

16 **MR. AZAM ISHMAEL:** If somebody was coerced,
17 not speaking specifically to Mr. Dong's case, the Liberal
18 Party of Canada offers a Safe Campaigns portal in which they
19 can reach out to the Liberal Party and file, potentially, an
20 anonymous complaint, it could be on the record, it could be
21 anonymous, in which that would trigger the investigation
22 mechanisms.

23 **MS. SARAH TEICH:** Does the Liberal Party have
24 language capabilities to receive complaints of this sort in
25 languages besides English and French?

26 **MR. AZAM ISHMAEL:** Generally speaking, it's
27 only English and French.

28 **MS. SARAH TEICH:** Would it be valuable to

1 enhance the language capabilities of the Liberal Party for
2 the future?

3 **MR. AZAM ISHMAEL:** We're always looking for
4 ways to communicate with Canadians in their preferred
5 language. If we had more resources, or we had a specific
6 complaint, you know, we'd probably be able to find the
7 resource needed to help, you know, discover it and action.

8 **MS. SARAH TEICH:** Okay. Thank you. You
9 stated to counsel for Mr. Chong earlier in cross-examination
10 that you don't think there's a concern of coercion because
11 the ballot box is secret. Would you agree that such
12 protections are generally not available in authoritarian
13 regimes?

14 **MR. AZAM ISHMAEL:** I don't want to make
15 comment on authoritarian regimes. You know, it depends on
16 which one. It depends on how they operate. So.

17 **MS. SARAH TEICH:** All right. Are you aware,
18 Mr. Ishmael, that authoritarian regimes at times detain
19 and/or interrogate their citizens arbitrarily?

20 **MR. AZAM ISHMAEL:** I would agree with that,
21 yeah.

22 **MS. SARAH TEICH:** Are you aware that they
23 also, at times, engage in hacking and/or other monitoring of
24 their citizens' devices?

25 **MR. AZAM ISHMAEL:** From my understanding of
26 authoritarian regimes, yes.

27 **MS. SARAH TEICH:** Would you agree that it's
28 possible that international students from authoritarian

1 regimes, if they return there, either to live or to visit,
2 may be subjected to arbitrary detention or interrogation and
3 asked forcefully to reveal who they voted for in a Canadian
4 democratic process?

5 **MR. AZAM ISHMAEL:** I can't really speak to
6 what the regimes would do, and if they had a specific
7 interest in this. So that'd be hard for me to say.

8 **MS. SARAH TEICH:** But you agree it would be
9 possible?

10 **MR. AZAM ISHMAEL:** Anything's really
11 possible.

12 **MS. SARAH TEICH:** Would you agree that it's
13 also possible that authoritarian regimes may be able to
14 discern how someone voted if they monitor their devices?
15 Say, for example, an elector texts someone or speaks to
16 someone about how they voted after the fact or before?

17 **MR. AZAM ISHMAEL:** I can't really speak to
18 the capacity of authoritarian regimes and their ability to
19 monitor social media accounts or text messaging, but.

20 **MS. SARAH TEICH:** Would you agree that even
21 the fear of these possibilities might make members of
22 diaspora communities vulnerable to coercion in a nomination
23 race or an election?

24 **MR. AZAM ISHMAEL:** That's an interesting
25 question. I haven't really thought of that, you know, too
26 in-depth, but I would think so, yes.

27 **MS. SARAH TEICH:** Okay. That's all my
28 questions. Thank you.

1 **COMMISSIONER HOGUE:** Thank you.

2 It's your turn, Government of Canada.

3 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

4 **MR. GREGORY TZEMANAKIS:**

5 **MR. GREGORY TZEMANAKIS:** Good morning. For
6 the record, my name is Gregory Tzemanakis. I'm with the
7 Government of -- with the Attorney General of Canada.

8 The questions I have for all the panel are
9 really clarification questions.

10 So I want to start off with a general one.
11 We've been speaking about foreign interference, and I just
12 want to understand if, when we say and we speak about foreign
13 interference, was it your understanding, I'm going to start
14 with Mr. Ishmael, was it your understanding at the material
15 time in 2019 and in 2021 that foreign interference activities
16 referred to activities conducted or supported by a foreign
17 state actor that were detrimental to Canada's national
18 interests and had the components of being covert, deceptive,
19 or coercive? Did you have that understanding at the time?

20 **MR. AZAM ISHMAEL:** Yes.

21 **MR. GREGORY TZEMANAKIS:** Ms. McGrath?

22 **MS. ANNE McGRATH:** Yes.

23 **MR. GREGORY TZEMANAKIS:** Mr. Soliman?

24 **MR. WALIED SOLIMAN:** Yes.

25 **MR. GREGORY TZEMANAKIS:** And at the material
26 time, if I understood your evidence correctly, in-chief, I
27 understood that prior to GE 44, so the 2021 election, Mr.
28 Ishmael, you said that foreign interference activities were

1 generally low on the radar. Is that correct?

2 **MR. AZAM ISHMAEL:** Correct.

3 **MR. GREGORY TZEMANAKIS:** And Mr. Soliman, you
4 equally said it was low on the radar; correct?

5 **MR. WALIED SOLIMAN:** Yes.

6 **MR. GREGORY TZEMANAKIS:** And Ms. McGrath, I
7 think you said you -- you worded it a little bit differently.
8 You said you were aware of the potential for foreign
9 interference. Is that ---

10 **MS. ANNE McGRATH:** Correct.

11 **MR. GREGORY TZEMANAKIS:** --- fair?

12 **MS. ANNE McGRATH:** Correct.

13 **MR. GREGORY TZEMANAKIS:** So can I ask the
14 Court Reporter to pull up CAN-13124 and to go to page 18 of
15 19 of that document, please? The bottom of the page, please,
16 under "Specific Case".

17 So this is a question to all of you. You'll
18 recall that Commission counsel took you to the first bullet
19 on this page, which reads:

20 "You may remember at the last [...]
21 security briefings we held with the
22 parties, SITE highlighted the fact
23 Chinese media had picked up on
24 Canadian media criticism (first
25 published in the Hill Times) and were
26 running stories about the CPC
27 platform and its impact on Canada-
28 China relations."

1 Do you recall -- do you each recall being
2 taken to that bullet?

3 **MR. AZAM ISHMAEL:** Yes.

4 **MS. ANNE McGRATH:** Yes.

5 **MR. WALIED SOLIMAN:** Yes.

6 **MR. GREGORY TZEMANAKIS:** Okay. The second
7 bullet in that section states:

8 "These articles appeared between 8
9 and 15 September, then stopped being
10 a [factor] of Chinese state reporting
11 on or about the 15th of September."

12 And the question I have, starting with Mr.
13 Ishmael, is, were you aware of these reports and these media
14 circulating between the 8th and 15th of September in 2021?
15 Were these brought to your attention?

16 **MR. AZAM ISHMAEL:** So I don't really know
17 which stories they're referencing, but I don't recall ever
18 seeing any stories like this between the 8th and 15th of
19 September.

20 **MR. GREGORY TZEMANAKIS:** Thank you.

21 Ms. McGrath?

22 **MS. ANNE McGRATH:** Yeah, same. I don't
23 recall ever being told this, or seeing this, or having any
24 information on this.

25 **MR. GREGORY TZEMANAKIS:** Okay. So the
26 stories that are being referred to, I just want to be fair to
27 you, the stories that are being referred to are the Hill
28 Times article, followed by certain media reporting on WeChat.

1 And I'll just leave it at that, at a very general level.

2 And that doesn't change your answer, Mr.

3 Ishmael?

4 **MR. AZAM ISHMAEL:** No.

5 **MR. GREGORY TZEMANAKIS:** You need to say no
6 for the record, Ms. McGrath.

7 **MS. ANNE McGRATH:** No.

8 **MR. GREGORY TZEMANAKIS:** And Mr. Soliman, did
9 you become aware of these articles at or about this time?

10 **MR. WALIED SOLIMAN:** No.

11 **MR. GREGORY TZEMANAKIS:** And can you tell us,
12 Mr. Soliman, when did you first learn of these media articles
13 that were circulating?

14 **MR. WALIED SOLIMAN:** I just told you I don't
15 recall them at all.

16 **MR. GREGORY TZEMANAKIS:** Okay. At all.
17 So thank you. Those are my questions.

18 **COMMISSIONER HOGUE:** Thank you.

19 Counsel for Mr. Ishmael.

20 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

21 **MS. LAURA DOUGAN:**

22 **MS. LAURA DOUGAN:** Thank you.

23 Mr. Ishmael, you indicated in response to a
24 previous question that you were not aware of any
25 irregularities relating to the Don Valley North nomination in
26 2019. You were taken to the Special Rapporteur's comments
27 suggesting a different conclusion. Have you been provided
28 with the intelligence information that the Special Rapporteur

1 had access to in coming to his conclusions?

2 **MR. AZAM ISHMAEL:** No.

3 **MS. LAURA DOUGAN:** What is your assessment
4 specifically that you're not aware of any irregularities
5 relating to the Don Valley North nomination, 2019 nomination,
6 based on?

7 **MR. AZAM ISHMAEL:** Well it's based on the
8 rigorous process that the party operates, you know, followed
9 by very specific and extensive rules, as well as, you know,
10 our processes are monitored not only by party staff and the
11 volunteers who are present, but also the opposing campaigns,
12 who have an active interest in ensuring that the election is
13 as far as possible. So when you look at our internal
14 processes, when you look at the potential for someone to file
15 a complaint, and then the review we did after the media
16 reports surfaced, my assessment remained the same, that there
17 was no irregularities.

18 **MS. LAURA DOUGAN:** And in your experience,
19 had someone tried to have a large group vote in a nomination
20 with falsified documentation, would that have likely to be
21 successful?

22 **MR. AZAM ISHMAEL:** It would have been
23 extremely unlikely. The reality of mobilizing hundreds or
24 potentially thousands of people without anybody being aware
25 are almost slim to nil. You almost can't keep a secret
26 between two people, so I couldn't imagine organizing hundreds
27 if not thousands of people, and then on top of it, with
28 falsified documents, and then also coming into the process

1 itself and meeting with, you know, the local officials.

2 **MS. LAURA DOUGAN:** Thank you. Those are my
3 questions.

4 **COMMISSIONER HOGUE:** Thank you.
5 Any re-examination, Ms. McGrann?

6 **MS. KATE McGRANN:** No, thank you.

7 **COMMISSIONER HOGUE:** Thank you. So we are in
8 advance. So we'll come back at 2:00 o'clock.

9 **MR. WALIED SOLIMAN:** Are we done ---

10 **THE REGISTRAR:** Order, please.

11 **MR. WALIED SOLIMAN:** Are we done, to be
12 clear? We can go home?

13 **COMMISSIONER HOGUE:** I'm sorry. Yes, you
14 are.

15 **MR. WALIED SOLIMAN:** Okay. Good. Thank you
16 all very much.

17 **COMMISSIONER HOGUE:** All of you.

18 **MR. WALIED SOLIMAN:** Thank you for the good
19 work. Thank you for the good work you're doing. This is an
20 important task. So thank you.

21 **COMMISSIONER HOGUE:** And thank you for your
22 time. Thank you very much.

23 **THE REGISTRAR:** Order, please. À l'ordre,
24 s'il vous plaît.

25 This hearing is now in recess until 2:00. La
26 séance est en pause jusqu'à 14 h 00.

27 --- Upon recessing at 2:0 p.m./

28 --- La séance est suspendue à 14 h 00

1 --- Upon resuming at 2:33 p.m./

2 --- La séance est reprise à 14 h 33

3 **THE REGISTRAR:** Order, please. À l'ordre,
4 s'il vous plaît.

5 This sitting of the Foreign Interference
6 Commission is back in session.

7 Cette séance de la Commission sur l'ingérence
8 étrangère est reprise.

9 **COMMISSIONER HOGUE:** Good afternoon.

10 **MR. HOWARD KRONGOLD:** Thank you.

11 **COMMISSIONER HOGUE:** So it's Mr. Krongold
12 that is conducting the examination.

13 **MR. HOWARD KRONGOLD:** The Commission's next
14 witness today is Han Dong. If the witness could please be
15 affirmed.

16 **THE REGISTRAR:** May I please have your full
17 name, and spell your last name for the record, please?

18 **MR. HAN DONG:** Han Dong, D-o-n-g.

19 **--- MR. HAN DONG, Sworn/Assermenté:**

20 **THE REGISTRAR:** Thank you very much.

21 You may proceed.

22 **MR. HOWARD KRONGOLD:** Thank you.

23 **--- EXAMINATION IN-CHIEF BY/INTERROGATOIRE EN-CHEF PAR**

24 **MR. HOWARD KRONGOLD:**

25 **MR. HOWARD KRONGOLD:** Good afternoon, Mr.
26 Dong.

27 **MR. HAN DONG:** Good afternoon.

28 **MR. HOWARD KRONGOLD:** Could the Court

1 Operator please bring up document WIT 10?

2 --- EXHIBIT No./PIÈCE No. WIT 10 EN:

3 Statement of Anticipated Evidence:

4 Han Dong

5 --- EXHIBIT No./PIÈCE No. WIT 10 EN:

6 Déclaration de preuve anticipée : Han

7 Dong

8 **MR. HOWARD KRONGOLD:** Mr. Dong, do you recall
9 that you were interviewed by Commission counsel on February
10 21st, 2024?

11 **MR. HAN DONG:** I do.

12 **MR. HOWARD KRONGOLD:** Okay. And you've had a
13 -- and this is a Statement of Anticipated Evidence that was
14 prepared by Commission counsel after that meeting?

15 **MR. HAN DONG:** Yes.

16 **MR. HOWARD KRONGOLD:** And you've had a chance
17 to review this document for accuracy?

18 **MR. HAN DONG:** Yes.

19 **MR. HOWARD KRONGOLD:** All right.

20 Could the clerk please bring up HDD 6?

21 --- EXHIBIT No./PIÈCE No. HDD 6:

22 Supplementary Information to

23 Statement of Anticipated Evidence of

24 Han Dong

25 **MR. HOWARD KRONGOLD:** Yesterday, Mr. Dong,
26 you provided the Commission with a document entitled,
27 "Supplementary Information to Statement of Anticipated
28 Evidence of Han Dong"?

1 **MR. HAN DONG:** Yes.

2 **MR. HOWARD KRONGOLD:** And that is this
3 document?

4 **MR. HAN DONG:** That's right.

5 **MR. HOWARD KRONGOLD:** And that supplement
6 clarifies three points in your Statement of Anticipated
7 Evidence.

8 **MR. HAN DONG:** Yes.

9 **MR. HOWARD KRONGOLD:** Okay. Subject to those
10 clarifications, are these two documents, when read together,
11 accurate, to the best of your knowledge, information, and
12 belief?

13 **MR. HAN DONG:** Yes.

14 **MR. HOWARD KRONGOLD:** Okay. Do you have any
15 other corrections, additions, or deletions beyond those in
16 the supplement?

17 **MR. HAN DONG:** I don't.

18 **MR. HOWARD KRONGOLD:** Okay. And will you
19 adopt these documents as part of your evidence before the
20 Commission?

21 **MR. HAN DONG:** I would.

22 **MR. HOWARD KRONGOLD:** Thank you.

23 I'm going to start very briefly with your
24 background, Mr. Dong. I understand you were born in 1977?

25 **MR. HAN DONG:** That's right.

26 **MR. HOWARD KRONGOLD:** Right. And during
27 university you got involved in Liberal Party politics?

28 **MR. HAN DONG:** Yes.

1 **MR. HOWARD KRONGOLD:** You were introduced to
2 politics through a gentleman by the name of Ted Lojko, who
3 we'll hear from later today?

4 **MR. HAN DONG:** That's correct.

5 **MR. HOWARD KRONGOLD:** All right. You ended
6 up working on campaigns, as I understand it, at both the
7 federal and provincial levels?

8 **MR. HAN DONG:** Yes.

9 **MR. HOWARD KRONGOLD:** Right. For the Liberal
10 Party?

11 **MR. HAN DONG:** Yes.

12 **MR. HOWARD KRONGOLD:** And you worked as a
13 political staffer, and were ultimately recruited to work for
14 a provincial MPP at Queen's Park in 2005, is that right?

15 **MR. HAN DONG:** That's correct.

16 **MR. HOWARD KRONGOLD:** Okay. In 2014 you were
17 elected the Liberal MPP for Trinity-Spadina?

18 **MR. HAN DONG:** Yes, that's right.

19 **MR. HOWARD KRONGOLD:** And you ran again in
20 2018, as I understand it?

21 **MR. HAN DONG:** That's right.

22 **MR. HOWARD KRONGOLD:** Right. And there was
23 an election, I think it was June 2018?

24 **MR. HAN DONG:** I think that's right.

25 **MR. HOWARD KRONGOLD:** Okay. And you were not
26 successful in that election campaign?

27 **MR. HOWARD KRONGOLD:** That's correct.

28 **MR. HOWARD KRONGOLD:** I understand that Mr.

1 Lojko was your campaign manager in both of those elections,
2 is that right?

3 **MR. HAN DONG:** Yes.

4 **MR. HOWARD KRONGOLD:** So you were out of
5 office after the 2018 Ontario election. And then in June
6 2019, the Liberal MP in Don Valley North, Geng Tan, announces
7 he's not running again.

8 **MR. HAN DONG:** Yes.

9 **MR. HOWARD KRONGOLD:** And you throw your hat
10 in the ring at the end of June 2019, is that right?

11 **MR. HAN DONG:** In June, yes.

12 **MR. HOWARD KRONGOLD:** Okay. There is
13 ultimately a contested nomination contest for that riding, or
14 for representation of the Liberal Party in that riding, is
15 that right?

16 **MR. HAN DONG:** That's correct.

17 **MR. HOWARD KRONGOLD:** And it's you and who
18 were running against each other?

19 **MR. HAN DONG:** It was me and Ms. Bang Gu
20 Jiang.

21 **MR. HOWARD KRONGOLD:** And I understand that
22 the nomination contest was held on September 12th, 2019?

23 **MR. HAN DONG:** That's right.

24 **MR. HOWARD KRONGOLD:** I want to ask you a
25 little bit about busing irregularities ---

26 **MR. HAN DONG:** Okay.

27 **MR. HOWARD KRONGOLD:** --- at the 2019 Don
28 Valley North nomination contest, okay?

1 **MR. HAN DONG:** Yeah.

2 **MR. HOWARD KRONGOLD:** When you met with
3 Commission counsel on February 21st this year, we discussed
4 whether you were aware of any irregularities in the May 2019
5 DVN nomination contest. Is that right?

6 **MR. HAN DONG:** That's right.

7 **MR. HOWARD KRONGOLD:** Right. And we also
8 discussed how your wife had rented a bus on behalf of the
9 campaign to transport voters to the nomination contest.

10 **MR. HAN DONG:** Yes, we discussed that, but
11 later on I was reminded there were two buses.

12 **MR. HOWARD KRONGOLD:** And that's one of the
13 things you clarify in your supplement.

14 **MR. HAN DONG:** That's right.

15 **MR. HOWARD KRONGOLD:** Okay.

16 **MR. HAN DONG:** I understand that you've also
17 recently recalled that beyond the two buses that your wife
18 was involved in procuring for the campaign, there was another
19 bus that you became aware of bringing voters to the
20 nomination contest.

21 **MR. HAN DONG:** That's right.

22 **MR. HOWARD KRONGOLD:** Okay. What can you
23 tell us about that bus?

24 **MR. HAN DONG:** Well, I was the candidate. I
25 was told by the campaign that there were students coming in a
26 bus to vote. I was reminded recently that -- by my wife
27 that, you know, there was a bus came in with students.

28 **MR. HOWARD KRONGOLD:** There was a bus coming

1 with students?

2 MR. HAN DONG: Or there was a bus, you know,
3 with students coming in to vote.

4 MR. HOWARD KRONGOLD: Okay. Can I just get a
5 little more detail about that?

6 MR. HAN DONG: Sure.

7 MR. HOWARD KRONGOLD: Where were these
8 people, students at; what institution?

9 MR. HAN DONG: I -- so I didn't see them, but
10 I was told that they came from a residence -- a students'
11 residence in the riding.

12 MR. HOWARD KRONGOLD: What's the residence?

13 MR. HAN DONG: It's the residence at Seneca
14 College.

15 MR. HOWARD KRONGOLD: Okay. Residence at
16 Seneca College?

17 MR. HAN DONG: That's right.

18 MR. HOWARD KRONGOLD: What school were they
19 students at?

20 MR. HAN DONG: I believe it was a private
21 school.

22 MR. HOWARD KRONGOLD: Okay. What private
23 school was it?

24 MR. HAN DONG: I think it's called the NOIC.

25 MR. HOWARD KRONGOLD: NOIC?

26 MR. HAN DONG: Yeah.

27 MR. HOWARD KRONGOLD: Do you know what that
28 stands for?

1 **MR. HAN DONG:** I think it's New Orient -- I
2 don't know what IC stands for; maybe International College?

3 **MR. HOWARD KRONGOLD:** Okay. And had you ever
4 had any connection to the students from NOIC?

5 **MR. HAN DONG:** I had -- during my campaign I
6 remember visiting the residence and had a conversation with
7 the students that came to the gathering. And I asked --
8 encouraged them to volunteer for my campaign, and for those
9 who are eligible, I encouraged them to register as -- members
10 so they can vote.

11 **MR. HOWARD KRONGOLD:** So they can vote in the
12 nomination contest.

13 **MR. HAN DONG:** That's right.

14 **MR. HOWARD KRONGOLD:** Okay. Tell me about
15 this meeting with NOIC with these students. When did that
16 occur, approximately?

17 **MR. HAN DONG:** I don't remember clearly but
18 it was in the summer, between June and September.

19 **MR. HOWARD KRONGOLD:** Okay. How many
20 students were in attendance?

21 **MR. HAN DONG:** I don't remember. It's very
22 vague. Probably 20; 20 students.

23 **MR. HOWARD KRONGOLD:** Okay. How did you come
24 to be at this school; were you invited there?

25 **MR. HAN DONG:** It was arranged by my
26 campaign. You know, it was a relatively short period of time
27 for the nomination race, so my campaign, myself, did our best
28 to reach out to all kinds of groups in the riding, and the

1 school's included.

2 **MR. HOWARD KRONGOLD:** So your campaign
3 arranged this for you to go to a school ---

4 **MR. HAN DONG:** Yeah.

5 **MR. HOWARD KRONGOLD:** --- to solicit support
6 from students?

7 **MR. HAN DONG:** To ask for volunteers and
8 support if they were eligible.

9 **MR. HOWARD KRONGOLD:** And who on your
10 campaign suggested this, or organized this?

11 **MR. HAN DONG:** I don't remember but, you
12 know, we had a small but very effective campaign team, so it
13 could be one of them.

14 **MR. HOWARD KRONGOLD:** And who was that
15 campaign team?

16 **MR. HAN DONG:** I remember my wife was taking
17 part in the campaign team, Ted Lojko, Elizabeth Petowski
18 (phonetic), she was there. Yeah. Oh, and Jonathan Tsao, who
19 eventually became my EA.

20 **MR. HOWARD KRONGOLD:** And these students who
21 you spoke to, what language did they speak?

22 **MR. HAN DONG:** They spoke -- I remember some
23 of them spoke good English, but Mandarin.

24 **MR. HOWARD KRONGOLD:** Okay. And what country
25 do you believe they were nationals of?

26 **MR. HAN DONG:** I think -- assume that they
27 were from PRC.

28 **MR. HOWARD KRONGOLD:** Okay. So international

1 students from China?

2 MR. HAN DONG: Although I can't be sure that
3 they were all international students. As I said, it's a
4 private school.

5 MR. HOWARD KRONGOLD: Fair enough.

6 MR. HAN DONG: Yeah.

7 MR. HOWARD KRONGOLD: This information about
8 a bus coming to the nomination campaign. As I understand it
9 from your supplementary statement, the purpose of them coming
10 there was to vote, presumably. Is that right?

11 MR. HAN DONG: Yes.

12 MR. HOWARD KRONGOLD: Okay. And how did you
13 find out about that bus having been at the nomination
14 campaign?

15 MR. HAN DONG: I was told by my campaign
16 staff afterwards.

17 MR. HOWARD KRONGOLD: Okay. Again, do you
18 recall who told you about it?

19 MR. HAN DONG: I don't. I don't know.

20 MR. HOWARD KRONGOLD: Okay. And when were
21 you told about this bus having come?

22 MR. HAN DONG: I can't remember exactly when,
23 but it was shortly after the campaign, and we talked about
24 the nomination campaign, and that came up.

25 MR. HOWARD KRONGOLD: Okay. And when you say
26 shortly after the campaign, does that mean shortly after
27 September 12th, 2019?

28 MR. HAN DONG: That's right.

1 **MR. HOWARD KRONGOLD:** Okay. And -- so just
2 so I understand it. Someone on your campaign staff said,
3 effectively, during the nomination vote a bus showed up with
4 a bunch of international students or students from NOIC,
5 something to that effect, that tweaked the connection for you
6 between campaigning at NOIC and the folks who arrived to vote
7 for you?

8 **MR. HAN DONG:** That's right.

9 **MR. HOWARD KRONGOLD:** Okay. Do you know who
10 arranged or paid for the bus?

11 **MR. HAN DONG:** You mean the bus with the
12 students?

13 **MR. HOWARD KRONGOLD:** Yes.

14 **MR. HAN DONG:** I don't.

15 **MR. HOWARD KRONGOLD:** Do you know what kind
16 of bus it was? Like anything you can tell us about that bus.

17 **MR. HAN DONG:** Like I said, I was busy
18 shaking hands at the door so I didn't see the bus, but I was
19 told it was a school bus. So I -- at the time, I assumed it
20 was a shuttle bus by -- provided by the school.

21 **MR. HOWARD KRONGOLD:** Okay. Do you know if
22 there was any coordination between your campaign and whoever
23 sent the bus?

24 **MR. HAN DONG:** I don't know.

25 **MR. HOWARD KRONGOLD:** All right. And when
26 did you first convey this information about there being a bus
27 containing international students that voted in your
28 nomination race? When did you first convey this information

1 to the Commission?

2 **MR. HAN DONG:** I think it was -- when did I
3 first? It was quite recent. It was, like I said, you know,
4 after the interview I was reminded by my wife that there was
5 a bus that came in, and that was when.

6 **MR. HOWARD KRONGOLD:** Like was it yesterday
7 that that information was conveyed to the Commission?

8 **MR. HAN DONG:** It was yesterday that as a
9 supplementary information.

10 **MR. HOWARD KRONGOLD:** And when did your wife
11 remind you about this?

12 **MR. HAN DONG:** Sorry?

13 **MR. HOWARD KRONGOLD:** Yesterday was
14 April 1st.

15 **MR. HAN DONG:** Right.

16 **MR. HOWARD KRONGOLD:** When did your wife
17 remind you about this bus?

18 **MR. HAN DONG:** It was after our initial
19 interview. So after the 21st ---

20 **MR. HOWARD KRONGOLD:** Okay.

21 **MR. HAN DONG:** --- but I don't -- I don't
22 have -- I don't remember exact -- which day.

23 **MR. HOWARD KRONGOLD:** It's been about six
24 weeks since April 1st.

25 **MR. HAN DONG:** M'hm.

26 **MR. HOWARD KRONGOLD:** I'm sorry. It's been
27 about six weeks since February 21st when you were
28 interviewed. Roughly when in that period of time do you

1 think that you had this conversation?

2 MR. HAN DONG: I think that it was closer to
3 yesterday, so maybe -- I really don't remember, but it feels
4 like the -- towards the end of March.

5 MR. HOWARD KRONGOLD: I'm sorry?

6 MR. HAN DONG: It feels like it was towards
7 the end of March.

8 MR. HOWARD KRONGOLD: Towards the end of
9 March. Okay. I understand that you were on a delegation to
10 China from March 22nd to March 30th.

11 MR. HAN DONG: Yes.

12 MR. HOWARD KRONGOLD: Was it while you were
13 China that you had ---

14 MR. HAN DONG: No. I think it was before
15 that.

16 MR. HOWARD KRONGOLD: Okay. So before
17 March 22nd?

18 MR. HAN DONG: Yes.

19 MR. HOWARD KRONGOLD: Okay. Did you take any
20 steps to advise the Commission by yesterday about this
21 information?

22 MR. HAN DONG: No. I spoke to my lawyer
23 about this.

24 MR. HOWARD KRONGOLD: Okay. I'm not going to
25 ask you about that.

26 MR. HAN DONG: Okay.

27 MR. HOWARD KRONGOLD: To put this in context,
28 I take it you're aware that since February of 2023, there

1 have been allegations in the media about irregularities in
2 the 2019 Don Valley North nomination contest; right?

3 MR. HAN DONG: Okay.

4 MR. HOWARD KRONGOLD: Are you aware of there
5 having been media reporting about irregularities in that
6 nomination contest?

7 MR. HAN DONG: To February 2023?

8 MR. HOWARD KRONGOLD: Yeah.

9 MR. HAN DONG: Yes.

10 MR. HOWARD KRONGOLD: Okay. And are you
11 aware that those irregularities have specifically been, the
12 reporting about those irregularities have specifically been
13 around busing in foreign students?

14 MR. HAN DONG: No, I don't know what those
15 irregularities were referring to.

16 MR. HOWARD KRONGOLD: Okay. So you were --
17 all right. Were you following David Johnston's report about
18 ---

19 MR. HAN DONG: Well, I read parts of it.

20 MR. HOWARD KRONGOLD: You read parts of it?

21 MR. HAN DONG: Yeah.

22 MR. HOWARD KRONGOLD: Okay. Were you
23 following his testimony at PROC?

24 MR. HAN DONG: I don't recall ---

25 MR. HOWARD KRONGOLD: Okay.

26 MR. HAN DONG: --- watching it.

27 MR. HOWARD KRONGOLD: Do you recall whether
28 he ever said that there were irregularities around the

1 nomination meeting and the busing of people and students in
2 relation to Don Valley North in 2019?

3 **MR. HAN DONG:** I don't recall.

4 **MR. HOWARD KRONGOLD:** Okay. When did you
5 first become aware that there were allegations of
6 irregularities around busing in foreign students in Don
7 Valley North in 2019?

8 **MR. HAN DONG:** It was in Mr. Johnston's
9 report I saw that he mentioned irregularities, but I never
10 connected irregularities to busing of students.

11 **MR. HOWARD KRONGOLD:** Did you read any of the
12 media reporting that discussed that?

13 **MR. HAN DONG:** Yeah.

14 **MR. HOWARD KRONGOLD:** Do you know when you
15 read the media reporting discussing irregularities around
16 students.

17 **MR. HAN DONG:** I couldn't give you a date.

18 **MR. HOWARD KRONGOLD:** Okay.

19 **MR. HAN DONG:** Couldn't give you a date.

20 **MR. HOWARD KRONGOLD:** Was it before you spoke
21 to the Commission six weeks ago?

22 **MR. HAN DONG:** Yeah.

23 **MR. HOWARD KRONGOLD:** Yeah. Okay. When we
24 interviewed you about six weeks ago, you'll recall that we
25 discussed international students volunteering and voting in
26 your nomination campaign?

27 **MR. HAN DONG:** Yes, we did.

28 **MR. HOWARD KRONGOLD:** And we discussed busing

1 as well?

2 MR. HAN DONG: I remember with discussing
3 busing of seniors.

4 MR. HOWARD KRONGOLD: Okay. The subject of
5 busing came up though.

6 MR. HAN DONG: Yes.

7 MR. HOWARD KRONGOLD: And you told us about
8 the bus, and now you've clarified you think it was two buses
9 that your wife rented. Right?

10 MR. HAN DONG: Yes.

11 MR. HOWARD KRONGOLD: And we asked you about
12 irregularities that were described by David Johnston. Right?

13 MR. HAN DONG: Right.

14 MR. HOWARD KRONGOLD: And the thrust of your
15 response was you'd like to know what the irregularities were.

16 MR. HAN DONG: That's right.

17 MR. HOWARD KRONGOLD: Okay. Did you
18 understand from all of that context, the media reporting,
19 David Johnston's report, maybe his testimony before PROC, to
20 the extent you were aware of it, did you understand from
21 those questions that we were interviewing you because we were
22 trying to get to the bottom of what happened in the Don
23 Valley North nomination contest?

24 MR. HAN DONG: Yes.

25 MR. HOWARD KRONGOLD: Okay. Did you
26 understand that our investigation included looking at
27 allegations of irregularities around busing in international
28 students when you were interviewed?

1 **MR. HAN DONG:** I didn't pay attention to, you
2 know, busing international students because at the time I
3 still -- I didn't understand it as a irregularity.

4 **MR. HOWARD KRONGOLD:** You didn't understand
5 it as an irregularity?

6 **MR. HAN DONG:** That's right.

7 **MR. HOWARD KRONGOLD:** Why didn't you tell the
8 Commission about this earlier?

9 **MR. HAN DONG:** Earlier? Well, first of all,
10 I -- like I said, I was reminded after the interview, and,
11 you know, to me international student, I had met them,
12 canvassed them, sign up. They show up to vote. To me, it's
13 pretty regular. Yeah.

14 **MR. HOWARD KRONGOLD:** Why did you tell us
15 about it yesterday?

16 **MR. HAN DONG:** Why did I tell you about it
17 yesterday? I was having a conversation with my lawyer, and I
18 said -- you know, it just -- it came to me ---

19 **MR. HOWARD KRONGOLD:** Just a second,
20 Mr. Dong.

21 **MR. MARK POLLEY:** If we can just make sure
22 Mr. Dong is reminded not to be speaking about the contents of
23 our discussions. I mean, the point is that it came up in our
24 discussion, that's fine, but I wouldn't want him talking
25 about our discussions.

26 **MR. HOWARD KRONGOLD:** Do you have any sense
27 why your wife reminded you about this?

28 **MR. HAN DONG:** We were talking about, you

1 know, this case and upcoming -- this ongoing inquiry. It's a
2 regular topic of our conversation, and she reminded me.

3 **MR. HOWARD KRONGOLD:** Can I roll things back
4 a bit?

5 I wanted to ask, why did you decide to spend
6 part of your time during the nomination campaign visiting a
7 school for international students?

8 **MR. HAN DONG:** Why did I spend time visiting
9 international students?

10 **MR. HOWARD KRONGOLD:** Yeah. Well, why did
11 you solicit support for your nomination campaign from
12 international students?

13 **MR. HAN DONG:** Well, it was a short period of
14 time for the campaign and I was reaching out to as many
15 groups as I can, senior groups, student groups, looking for
16 volunteers and they live in the riding, urge them to vote.
17 And I encouraged them to sign up as a Liberal -- as Liberal
18 members.

19 **MR. HOWARD KRONGOLD:** We may hear some
20 evidence from Mr. Lojko that nomination campaigns don't
21 usually target high school students because they're typically
22 not motivated or reliable voters. Do you agree with that
23 sentiment?

24 **MR. HAN DONG:** To me, when I met them, they
25 looked very interested. I remember like when I meet with, in
26 general, high school students, they -- my impression is
27 they're interested in the process and they would like to
28 volunteer, so I can tell you why that was Mr. Lojko's

1 observation.

2 **MR. HOWARD KRONGOLD:** You don't share that
3 view.

4 **MR. HAN DONG:** I'm a candidate. I'm out on
5 the street knocking on doors and the operation of the
6 campaign is up to the manager.

7 **MR. HOWARD KRONGOLD:** Okay. Could we call up
8 document CAN 4728?

9 **--- EXHIBIT No./PIÈCE No. CAN 4728:**

10 Foreign Interference in the 2019
11 Federal Campaign of Dong Han - CNSB
12 23/19

13 **MR. HOWARD KRONGOLD:** So this is a redacted
14 intelligence document. First of all, in fairness to you, I
15 should make clear that we received your Supplementary
16 Statement of Anticipated Evidence before this document would
17 have been made available to you and your counsel.

18 I also want to emphasize that this is an
19 intelligence document. It's heavily redacted. And the
20 assertions or statements made in here are not proven facts,
21 okay. And in fact, right on the front page, if you could
22 page down, please, you'll see -- stop. You'll see about the
23 third line down -- sorry, the first readable sentence, it's a
24 portion of a sentence, but it says "it was alleged that the
25 PRC interfered in the Don Valley North Liberal nomination of
26 September 12, 2019 remain unsubstantiated".

27 So there's a little bit of grammatical
28 collision there, but I think the point that it remains

1 unsubstantiated is included in that statement.

2 The reason I want to ask you about this
3 document is just to get your comments as someone who may have
4 firsthand knowledge about some of this information.

5 So if we could flip to the second page,
6 please.

7 And what this is, is there's a box here which
8 is redacted information, and the italicized text there is a
9 summary that's been provided. What that says is:

10 "The redacted text references
11 campaign efforts of Han Dong to
12 register new Liberal Party members,
13 including international students, to
14 vote in the nomination race."

15 First of all, do you agree that there were
16 campaign efforts of Han Dong to register new Liberal Party
17 members to vote in the nomination race?

18 **MR. HAN DONG:** Yes.

19 **MR. HOWARD KRONGOLD:** Okay. And do you agree
20 that there were -- that you made efforts to register new
21 Liberal Party members, including international students, in
22 the nomination race?

23 **MR. HAN DONG:** Yes.

24 **MR. HOWARD KRONGOLD:** Okay. I'm going to
25 turn next to one of the topical summaries that has come out.
26 And this is titled "Don Valley North DVN Liberal Party
27 Nomination Race in 2019".

28 And in fairness to you, sir, you received

1 this document and had a chance to review it for the very
2 first time this morning and, of course, that information is
3 all coming after you'd provided us with your supplementary
4 statement.

5 **MR. HAN DONG:** M'hm.

6 **MR. HOWARD KRONGOLD:** And again, I should be
7 very clear, there's a whole page of caveats here which I
8 think we've heard earlier in the day, but this is essentially
9 a summary of intelligence holdings produced by the Government
10 of Canada. It's subject to many, many caveats.

11 And again, I'm not suggesting to you that the
12 intelligence discussed here is proven fact. Again, what I'm
13 hoping you'll provide is any firsthand information that may
14 shed light on what is said here.

15 So if we can flip to the second page, I
16 wanted to take you to -- I guess let's call it 2.1. You see
17 the first indent, the indented number 1? There's a line that
18 says, "Intelligence reporting indicated". This is obviously
19 in relation to Don Valley North nomination contest 2019.

20 "Intelligence reporting indicated
21 that buses were used to bring
22 international students to the
23 nomination process in support of Han
24 Dong."

25 Do you have any comments about the
26 truthfulness of that statement?

27 I'm sorry. Not commenting on the
28 intelligence reporting, of course, but on whether buses were

1 used to bring international students to the nomination
2 process in support ---

3 **MR. HAN DONG:** Well, to the best of my
4 knowledge, there was one bus.

5 **MR. HOWARD KRONGOLD:** Okay.

6 **MR. HAN DONG:** In support of Han Dong, I -- I
7 just know that they -- I was told that they came in to vote
8 and how they voted and whether in support of me or my
9 opponent, I really -- there's no way for me to find out.

10 **MR. HOWARD KRONGOLD:** There's no what?

11 **MR. HAN DONG:** There's no way for me to find
12 out how they voted.

13 **MR. HOWARD KRONGOLD:** Okay. Were they
14 students who you think were the same ones who you solicited
15 for your support?

16 **MR. HAN DONG:** I didn't see them, so I can't
17 confirm.

18 **MR. HOWARD KRONGOLD:** Okay. But I'm just
19 trying to understand. You seem to have made the link between
20 what you were told about this bus of students arriving and
21 going to this school to solicit support from the students.

22 **MR. HAN DONG:** Right.

23 **MR. HOWARD KRONGOLD:** Can you tell us
24 anything about why you drew that link?

25 **MR. HAN DONG:** Because I -- when my wife
26 reminded me that there was a bus with students came in, I
27 asked -- I said, you know, "Where they came from?". And she
28 indicated it was from Seneca residence, and that's when I

1 draw the connection. I was there to canvass for their
2 support.

3 **MR. HOWARD KRONGOLD:** And this is when you
4 talked to your -- I'm just trying to understand because you -
5 - the -- you were told by someone on your campaign I think
6 you said shortly after September 12th, 2019 ---

7 **MR. HAN DONG:** That's right.

8 **MR. HOWARD KRONGOLD:** --- about a bus having
9 arrived.

10 **MR. HAN DONG:** Right.

11 **MR. HOWARD KRONGOLD:** And did you understand
12 at that time that it was from Seneca College?

13 **MR. HAN DONG:** I don't recall but, you know,
14 when I talked to my wife recently about the -- when she
15 remind me about the bus, I asked her where was the bus from
16 and she said it was from the Seneca residence.

17 **MR. HOWARD KRONGOLD:** I'm sorry. There was
18 another line there I wanted to take you to. It's subpoint 2:

19 "Some intelligence reporting also
20 indicated that the students were
21 provided with falsified documents to
22 allow them to vote despite not being
23 residents of DVN. The documents were
24 provided by individuals associated
25 with a known proxy agent."

26 And then there's a footnote explaining what a
27 proxy agent is.

28 Do you have any knowledge of the information

1 in this bullet point?

2 MR. HAN DONG: I don't.

3 MR. HOWARD KRONGOLD: I'm going to turn to
4 another subject.

5 And I should just state, and this is not for
6 your benefit, Mr. Dong, that the document we've been
7 referring to is CAN.SUM.00001.

8 --- EXHIBIT No./PIÈCE No. CAN.SUM 1:

9 Topical Summary: Don Valley North
10 Liberal Party Nomination Race in 2019

11 MR. HOWARD KRONGOLD: I don't expect you to
12 make sense of that, Mr. Dong.

13 I understand that when you were -- well,
14 let's skip ahead. You were, of course, elected.

15 MR. HAN DONG: Sorry. Can we just go back to
16 the last point?

17 I think because you were asking about the
18 Seneca bus and when you showed me the documents about busing
19 students, I automatically understood as you meant the bus was
20 the bus that I was talking about. So I made an assumption
21 that the bus mentioned in the document you just showed me is
22 the bus that we were discussing earlier. Maybe I shouldn't
23 have made that automatic assumption.

24 MR. HOWARD KRONGOLD: That's okay. I think -
25 - I see, so you're saying that in point, I guess 2.1, ---

26 MR. HAN DONG: M'hm.

27 MR. HOWARD KRONGOLD: --- that first sentence
28 that we read, it refers to busses, ---

1 **MR. HAN DONG:** Yeah.

2 **MR. HOWARD KRONGOLD:** --- and you made the
3 assumption, if that's the right word, that that was referring
4 to the bus from Seneca that you were made aware of?

5 **MR. HAN DONG:** That we were talking about
6 earlier. That's why I made a correction that it was one bus.

7 **MR. HOWARD KRONGOLD:** Yes.

8 **MR. HAN DONG:** But it's -- I don't think it's
9 fair for me to make that assumption.

10 **MR. HOWARD KRONGOLD:** Right. I see your
11 point.

12 And I think on the next bullet point, I
13 already asked you if you had any comments about that, but is
14 there something else you wanted to say about 2.2?

15 **MR. HAN DONG:** No.

16 **MR. HOWARD KRONGOLD:** Okay. I'm going to
17 turn then to another subject. You were, of course, elected
18 to be the MP. Well, you ultimately ran the -- won the Don
19 Valley North nomination race, and then won in the General
20 Election in 2019 and became the MP for Don Valley North.

21 I understand that when you were serving as --
22 or as you've been serving as an MP, you have had
23 communications with consular officials from a variety of
24 countries, including from the People's Republic of China. Is
25 that right?

26 **MR. HAN DONG:** That's right.

27 **MR. HOWARD KRONGOLD:** And when we interviewed
28 you, we talked about your conversations with the PRC Consul

1 General, specifically about the "Two Michaels"?

2 MR. HAN DONG: Yes.

3 MR. HOWARD KRONGOLD: Michael Spavor and
4 Michael Kovrig?

5 MR. HAN DONG: That's right.

6 MR. HOWARD KRONGOLD: Okay. I'm going to
7 take you to another topical summary. This one is titled
8 *Intelligence Relating to Han Dong and Communication with*
9 *People's Republic of China Officials Regarding the "Two*
10 *Michaels"*

11 And I'm going to, of course, make the same
12 caveats as before. This is a summary of Government of Canada
13 intelligence holdings. There's an entire page of
14 qualifications. And I should perhaps note that one of those
15 is that the document does not indicate whether the
16 information being described was translated from another
17 language.

18 I'm, again, not suggesting that what's
19 written here is true or is a proven fact, and the purpose of
20 what I'm about to ask you is just to get your first-hand
21 information on the subjects discussed.

22 My first question for you is, when you spoke
23 to the Consul General for China about the "Two Michaels",
24 what language were you speaking in?

25 MR. HAN DONG: Mandarin.

26 MR. HOWARD KRONGOLD: Mandarin?

27 MR. HAN DONG: Yeah. Mostly Mandarin.

28 MR. HOWARD KRONGOLD: All right. So if we

1 can flip to the second page, you'll see there are six points
2 here. And what I'm going to ask you is essentially whether
3 there is any correspondence between what's written in this
4 document and any conversations you had with the Consul
5 General about the "Two Michaels". Okay?

6 **MR. HAN DONG:** Okay.

7 **MR. HOWARD KRONGOLD:** So point number one
8 says:

9 "In early 2021, Han Dong (henceforth
10 Dong), MP for Don Valley North,
11 expressed views in private on a range
12 of topics, including the state of the
13 PRC-Canada relationship."

14 Is there any correspondence between that and
15 your conversations with the Consul General?

16 **MR. HAN DONG:** I don't recall that
17 conversation. After the news article came out, I confirmed
18 with my office that it was likely that we had a conversation
19 in, you know, early 2021.

20 **MR. HOWARD KRONGOLD:** Okay. Are you able to
21 say one way or another whether that conversation might have
22 included discussions about the state of the PRC-Canada
23 relationship?

24 **MR. HAN DONG:** It's possible. I don't
25 remember, but it's possible.

26 **MR. HOWARD KRONGOLD:** Okay. The next
27 sentence is:

28 "Dong made it clear he was not

1 speaking on behalf of the Government
2 of Canada but sharing his personal
3 views on the matter."

4 Do you recall, or could that have been
5 something that you said in this ---

6 **MR. HAN DONG:** It could.

7 **MR. HOWARD KRONGOLD:** Okay. Point two:

8 "[Mr.] Dong's comments focussed
9 primarily on the House of Commons'
10 Uyghur Genocide in Xinjiang motion."

11 Again, ---

12 **MR. HAN DONG:** It's possible. I don't recall
13 specifically, but, it's possible.

14 **MR. HOWARD KRONGOLD:** Okay.

15 "The 'Two Michaels' (Michael Kovrig
16 and Michael Spavor) were also raised
17 in the broader context of Sino-Canada
18 relations."

19 **MR. HAN DONG:** I always bring up -- advocate
20 for early release of the "Two Michaels", so it's possible.

21 **MR. HOWARD KRONGOLD:** Okay. And I'm sorry,
22 you just said that you always bring up the "Two Michaels"?

23 **MR. HAN DONG:** I always advocate for early
24 release of the "Two Micheals", so it's possible.

25 **MR. HOWARD KRONGOLD:** Okay. And do you
26 recall if that would have been the subject of any of your
27 conversations with the Consul General?

28 **MR. HAN DONG:** Yes.

1 **MR. HOWARD KRONGOLD:** Yes, it would have
2 been?

3 **MR. HAN DONG:** It would have been.

4 **MR. HOWARD KRONGOLD:** Okay. Number Three:
5 "On the 'Two Michaels', MP Dong
6 emphasized that the Canadian public
7 believed that the PRC's approach to
8 the Two Michaels was wrong and
9 lacking legal justification."

10 Is that or might that have been something
11 that you said in a conversation with the Consul General?

12 **MR. HAN DONG:** It could be.

13 **MR. HOWARD KRONGOLD:**

14 "Canadians believed that Canada was
15 merely fulfilling its legal
16 obligation in relation to Meng
17 Wanzhou, Chief Financial Officer for
18 Huawei."

19 **MR. HAN DONG:** I don't remember that, but
20 possible.

21 **MR. HOWARD KRONGOLD:** Number four:

22 "More precisely, MP Dong's reference
23 to the detention of the 'Two
24 Michaels' came in the context of MP
25 Dong noting the difficulty of getting
26 people to change perspectives once
27 particular positions solidified."

28 I'm going to keep going, because that seems a

1 little general.

2 **MR. HAN DONG:** Yeah.

3 **MR. HOWARD KRONGOLD:**

4 "MP Dong expressed the view that even
5 if the PRC released the 'Two
6 Michaels' at that moment, opposition
7 parties would view the PRC's action
8 as an affirmation of the
9 effectiveness of a hardline Canadian
10 approach to the PRC."

11 Is that something you recall saying, or think
12 you might have said?

13 **MR. HAN DONG:** I'm trying to translate this
14 into Chinese and it just doesn't make any sense. So I --
15 actually, I don't remember, but it doesn't make a lot of
16 sense here ---

17 **MR. HOWARD KRONGOLD:** Okay.

18 **MR. HAN DONG:** --- when I read this right
19 now.

20 **MR. HOWARD KRONGOLD:** It doesn't make a lot
21 of sense in what way?

22 **MR. HAN DONG:** Well I think, you know,
23 whenever I talk about the "Two Michaels", I will make -- I
24 will try to show that, you know, early release of the "Two
25 Michaels" is good for the relationship between two countries,
26 therefore it's something that the Chinese Canadian media
27 would like to see. So I -- but I'm a little confused by the
28 information here. I don't quite get the logic here.

1 **MR. HOWARD KRONGOLD:** Is it -- it might be
2 hard to interpret exactly what the summary means. I
3 appreciate that. But is what's said there, do you feel like
4 it's consistent or inconsistent with the sentiments that you
5 would have expressed in a phone call with the Consul General?

6 **MR. HAN DONG:** I'm not sure. It doesn't --
7 like I said, I don't remember, but I mean, the logic here
8 kind of doesn't add up for me.

9 **MR. HOWARD KRONGOLD:** Okay. Point five:
10 "MP Dong stressed that any
11 transparency provided by the PRC in
12 relation to the 'Two Michaels', such
13 as a court hearing or a court date,
14 would help to placate Canadian public
15 opinion and provide some valuable
16 talking points to his own political
17 party against the opposition."

18 So same question. Is that something you
19 recall saying or you think you might have said?

20 **MR. HAN DONG:** The first half of the
21 sentence, you know, stressed the transparency, such as a
22 court hearing, a date, I think it's possible that I would
23 advocate for that. And I'm not sure about the second part.

24 **MR. HOWARD KRONGOLD:** Okay. Can you help us
25 out at all about the second part? In terms of whether that's
26 something, if you don't recall, well ---

27 **MR. HAN DONG:** I don't recall saying that.

28 **MR. HOWARD KRONGOLD:** You don't recall saying

1 that?

2 **MR. HAN DONG:** No.

3 **MR. HOWARD KRONGOLD:** Okay.

4 Number 6:

5 "MP Dong also noted that a Canadian
6 hardline approach to the PRC would be
7 detrimental to Sino-Canada
8 relations."

9 **MR. HAN DONG:** It's possible. I mean, I
10 don't recall saying that exactly, but it's possible.

11 **MR. HOWARD KRONGOLD:** Okay. I'm going to
12 move on to another subject now. I'm going to rewind the tape
13 a little bit. And I want to just focus your attention on the
14 period when you were out of government.

15 So I think it was roughly about June 2018
16 when -- whenever the Ontario Provincial Election occurred,
17 until when you won your seat for the first time as an MP on
18 October 21st, 2019.

19 **MR. HAN DONG:** Okay.

20 **MR. HOWARD KRONGOLD:** So in this period, from
21 June 2018 until October 21st, 2019, did you have any contact
22 with PRC consular officials?

23 **MR. HAN DONG:** Not that I recall.

24 **MR. HOWARD KRONGOLD:** Not that you recall?

25 **MR. HAN DONG:** Not that I recall.

26 **MR. HOWARD KRONGOLD:** Finally, I wanted to
27 ask you about Michael Chan. I understand that you've known
28 him -- well, how long have you known him for?

1 **MR. HAN DONG:** I remember, I worked on his
2 very first bi-election. That was in 2007.

3 **MR. HOWARD KRONGOLD:** Yeah.

4 **MR. HAN DONG:** I met him before events. So
5 it's safe to say, you know, a little bit before 2007.

6 **MR. HOWARD KRONGOLD:** Okay. And you both
7 would have been at Queens Park at the same time I take it?

8 **MR. HAN DONG:** I was -- I was a PHAT person
9 until 2014, elected as an MPP. So yeah, you know -- and he
10 was elected in 2007, and worked in his capacity as an MPP and
11 later on, cabinet minister.

12 **MR. HOWARD KRONGOLD:** Okay. After you lost
13 in the 2018 provincial election, what was the nature of your
14 relationship with Michael Chan at that point?

15 **MR. HAN DONG:** It was -- I -- I don't
16 remember we met or chatted often after 2018's defeat. There
17 could be, you know, phone calls or meetings to talk about the
18 state of Chinese community. Yeah, it wasn't very often. I
19 respect him as a senior leader in the community.

20 **MR. HOWARD KRONGOLD:** Did he play any role in
21 your decision to run for the Liberal nomination in Don Valley
22 North?

23 **MR. HAN DONG:** In my decision? No. But he
24 did call me as soon as Mr. Geng Tan announced that he is not
25 seeking re-election. Michael was one of the first one to
26 call me to tell me that information.

27 **MR. HOWARD KRONGOLD:** Did he play any role in
28 the nomination campaign in Don Valley North in 2019?

1 **MR. HAN DONG:** I remember he came to my
2 announcement seeking nomination, and then later on probably
3 came out once or maybe twice to canvass with me at the door,
4 but that's it.

5 **MR. HOWARD KRONGOLD:** Okay. Thank you very
6 much, Mr. Dong.

7 **MR. HAN DONG:** Okay.

8 **COMMISSIONER HOGUE:** I have one question for
9 you, Mr. Dong.

10 **MR. HAN DONG:** Sure.

11 **COMMISSIONER HOGUE:** And I'm going back to
12 the first topic that have been explored by M. Krongold. At
13 the time that the allegation of irregularities surfaced in
14 the media, did you try to get more information about what
15 they were all about?

16 **MR. HAN DONG:** I did. I remember I did ask
17 some of the key peoples in my campaign, Ted, including, my
18 wife as well, asked them -- asking them if they remember or
19 spotted any irregularities of what this could be referring
20 to, and the answer was no.

21 **COMMISSIONER HOGUE:** Yeah, but at the time
22 did you look at the media's news that have been forwarded or
23 not at all?

24 **MR. HAN DONG:** I remember reading the news
25 articles, and I remember we were talking about how these
26 pictures were pulled off my, like, social media page. And
27 that's when I learned a bit more about, you know, rented two
28 bus and they're not the same bus at the picture shows. And -

1 - so that's the time that we, you know, we raised about the
2 media reporting.

3 **COMMISSIONER HOGUE:** Okay. So at that point
4 in time, did you realise that actually the allegations were
5 in relation to international students transported by buses?

6 **MR. HAN DONG:** The media article said that,
7 yes.

8 **COMMISSIONER HOGUE:** Okay. And you knew that
9 right after the media reported these allegations?

10 **MR. HAN DONG:** Yeah, as alleged by the
11 article, yes.

12 **COMMISSIONER HOGUE:** Okay. Can you tell me
13 when it was, approximately?

14 **MR. HAN DONG:** I think the news article, to
15 my memory, it was in February 2023. February 2023.

16 **COMMISSIONER HOGUE:** Yeah. Thank you.

17 **MR. HOWARD KRONGOLD:** I just wanted to
18 indicate that the second topical summary referred to is
19 CAN.SUM 2. Thank you.

20 **--- EXHIBIT No./PIÈCE No. CAN.SUM 2:**

21 Topical Summary: Intelligence
22 Relating to Han Dong and
23 Communication with PRC Officials
24 Regarding the "Two Michaels"

25 **COMMISSIONER HOGUE:** Thank you.

26 So we'll begin the cross-examinations. The
27 first one is counsel for Michael Chong.

28 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

1 MR. GIB van ERT:

2 MR. GIB van ERT: Good afternoon. Sir, do
3 you accept that the People's Republic of China is attempting
4 to interfere in Canadian democracy?

5 MR. HAN DONG: I have seen reports about
6 that. I personally haven't seen any evidence of it.

7 MR. GIB van ERT: So you don't accept it or
8 you do?

9 MR. HAN DONG: I -- I have never personally
10 seen any evidence of it.

11 MR. GIB van ERT: That's not the question I
12 asked you. I haven't seen any evidence of it personally
13 myself, but we have very serious allegations, and we're all
14 here because every federal political party agreed that a
15 judge needed to be appointed to investigate these very
16 issues.

17 So I'll ask you again. Do you accept ---

18 MR. HAN DONG: It's possible.

19 MR. GIB van ERT: It's possible. It's
20 possible. All right.

21 Now, I understand that you do not believe
22 that there was any interference in your nomination contest.
23 Isn't that right?

24 MR. HAN DONG: To the best of my knowledge,
25 yes.

26 MR. GIB van ERT: All right. If it turns out
27 that you're mistaken about that, and in fact there was
28 interference by the PRC, if that turns out to be true, do you

1 accept that that would be foreign interference in our
2 democracy?

3 **MR. HAN DONG:** Could you ask the question
4 again? Sorry.

5 **MR. GIB van ERT:** Yes. If it turns out,
6 despite your belief that this didn't happen, if it turns out
7 that in fact it did happen, do you accept that that would be
8 an outrageous intervention by the PRC in our democracy?

9 **MR. HAN DONG:** Yes.

10 **MR. GIB van ERT:** Thank you. And if turns
11 out that the People's Republic of China helped you to your
12 seat in the House of Commons in this way, do you accept that
13 the people of Canada have the right to know that?

14 **MR. HAN DONG:** Yes.

15 **MR. GIB van ERT:** Thank you. And do you
16 accept that if voters at your nomination contest, or on
17 polling day, knew that you were getting this sort of help
18 some of them might not have supported you?

19 **MR. HAN DONG:** I think that's a fair
20 statement, yeah.

21 **MR. GIB van ERT:** Thank you. Do you accept
22 further that the Canadian Security Intelligence Service is
23 obliged by its statutory mandate to investigate threats to
24 the security of Canada ---

25 **MR. HAN DONG:** Yes.

26 **MR. GIB van ERT:** --- to investigate this
27 sort of allegation?

28 **MR. HAN DONG:** Yes.

1 **MR. GIB van ERT:** Thank you. Some members of
2 your party, or maybe I should say your former party, have
3 suggested that to raise concerns about foreign interference
4 in your nomination contest is a kind of anti Chinese racism
5 or Sinophobia. Do you agree with me, sir, that it was not a
6 matter of racism on the part of the CSIS on the part of our
7 intelligence agencies to explore this matter and try to get
8 to the bottom of it?

9 **MR. HAN DONG:** I haven't seen any concrete
10 evidence, so I can understand why those comments were made.

11 **MR. GIB van ERT:** I'm not sure I understood
12 your answer. You can understand why which comments were
13 made?

14 **MR. HAN DONG:** The comments that you just
15 referred to some members of the Liberal Party ---

16 **MR. GIB van ERT:** All right.

17 **MR. HAN DONG:** --- see this as a anti Asian
18 sentiment.

19 **MR. GIB van ERT:** All right. But my question
20 for you is, sitting her now, you've just told me that you
21 accept that the service has a statutory duty to investigate
22 threats to the security of Canada. If the service this
23 matter in Don Valley North, it's not being racist in doing
24 so, it's just doing its job. Don't you agree?

25 **MR. HAN DONG:** I think that's -- I think CSIS
26 has a duty to investigate any ridings or, you know, election
27 races, and if they receive credible information that, you
28 know, there was signs of foreign interference.

1 **MR. GIB van ERT:** Yes, I quite agree. And in
2 doing so, it's not acting in a racist way, it's just doing
3 its job.

4 **MR. HAN DONG:** That's right.

5 **MR. GIB van ERT:** Thank you.

6 And do you accept, finally, that if ordinary
7 Canadians reading these reports in the media are alarmed and
8 concerned and worried, that isn't necessarily coming from a
9 place of anti-Chinese racism; that's a good-faith concern, at
10 least in some cases -- hopefully in all cases -- for the
11 health and integrity of our democracy. Do you accept that,
12 sir?

13 **MR. HAN DONG:** I accept that, yeah.

14 **Mr. GIB van ERT:** Thank you.

15 Let's come onto the buses, please. When you
16 met with the Commissioner, you recalled one bus. As of today
17 we're up to three, right?

18 **MR. HAN DONG:** When I had the interview, my
19 memory had one bus. And then quickly, you know, I correct my
20 records and it was two buses that my campaign rented.

21 **MR. GIB van ERT:** You say you did so quickly?

22 **MR. HAN DONG:** Sorry?

23 **MR. GIB van ERT:** You say you corrected this
24 quickly?

25 **MR. HAN DONG:** I think it was within days
26 after the interview I -- you know, I corrected that it was
27 two buses my campaign rented.

28 **MR. GIB van ERT:** All right. Well, we only

1 found out about it yesterday for it being a second bus. And
2 then it turns out that a third bus came up over lunch.
3 Doesn't seem very quick to me, sir. Are you saying that the
4 Commission hasn't informed us in time, or is it instead that
5 maybe you didn't inform the Commission as quickly as you
6 could?

7 **MR. HAN DONG:** I forgot exactly when we
8 correct the records as to how many buses my campaign rented,
9 whether it was one or two, I forgot exactly when. But, no,
10 we volunteered to correct that record.

11 **MR. GIB van ERT:** All right. The third bus
12 is apparently associated with a school, a high school, called
13 NOIC Academy, right?

14 **MR. HAN DONG:** Yes.

15 **MR. GIB van ERT:** Thank you. And that school
16 is located at 50 Featherstone Avenue, Markham, right?

17 **MR. HAN DONG:** Right, that's the current
18 address but previously it was in North York.

19 **MR. GIB van ERT:** Previously being in
20 2019?

21 **MR. HAN DONG:** In 2019.

22 **MR. GIB van ERT:** Where was it located in
23 2019?

24 **MR. HAN DONG:** I don't recall but I ---

25 **MR. GIB van ERT:** Was it in your riding?

26 **MR. HAN DONG:** The residence is in my riding.

27 **MR. GIB van ERT:** Yes, but was the school in
28 your riding?

1 **MR. HAN DONG:** I don't recall, but the
2 residence was in my riding.

3 **MR. GIB van ERT:** Yes, but I want to know
4 where the school was, because the school when it was located
5 at 50 Featherstone, which is its current location, is not in
6 your riding; it's in the riding of Mary Ng. At the time, in
7 2019, when you went to campaign at this school, was it in
8 your riding or in someone else's riding?

9 **MR. HAN DONG:** I don't recall its previous
10 address, but I think they moved to Markham in the last -- I
11 think it was after 2019.

12 **MR. GIB van ERT:** So I'm not concerned with
13 its exact address, but I want your evidence; I want you to
14 tell the Commissioner, under oath, whether that school in
15 2019 was located in your riding?

16 **MR. HAN DONG:** I can't give you that
17 information because I don't recall, but I can tell you for
18 sure that the residence is in the riding, and that is the
19 address that would -- as part of eligibility.

20 **MR. GIB van ERT:** Sir, in 2019 when you were
21 campaigning for the nomination, were you in the habit of
22 leaving your riding and campaigning in neighbouring ridings?

23 **MR. HAN DONG:** I always campaign in my
24 riding.

25 **MR. GIB van ERT:** That's not what I asked
26 you. I asked you whether you were in the habit of leaving
27 your riding and campaigning in neighbouring ridings.

28 **MR. HAN DONG:** No.

1 **MR. GIB van ERT:** Did you ever do so?

2 **MR. HAN DONG:** During my nomination race?

3 **MR. GIB van ERT:** Yes.

4 **MR. HAN DONG:** No.

5 **MR. GIB van ERT:** But you're not sure whether
6 this school that you attended was in your riding or not?

7 **MR. HAN DONG:** I attended the residence at
8 Seneca, that's where I first met the students. I did not
9 meet them at their school.

10 **MR. GIB van ERT:** I see, all right. So
11 you're saying that you attended at their residence and the
12 residence is in your riding.

13 **MR. HAN DONG:** That's correct.

14 **MR. GIB van ERT:** All right. Who organized
15 for you to go to the residence of a bunch of students to
16 campaign there?

17 **MR. HAN DONG:** My campaign staff organized
18 the gathering -- or, sorry; organized my meeting with the
19 group of students. They probably contact someone that, you
20 know, is looking after these students. I can't give you more
21 information than that.

22 **MR. GIB van ERT:** You met them at their
23 residence?

24 **MR. HAN DONG:** I met them at their residence.

25 **MR. GIB van ERT:** In their rooms?

26 **MR. HAN DONG:** To the best of my recollection
27 was not -- no, not at their room. It was like a meeting
28 space at the residence.

1 **MR. GIB van ERT:** All right. Turning to
2 these other two coaches, you say that your wife organized the
3 rental of those, right?

4 **MR. HAN DONG:** Yes.

5 **MR. GIB van ERT:** And they travelled around
6 on nomination day, the 12th of September, and picked up
7 voters, right?

8 **MR. HAN DONG:** To the best of my knowledge,
9 they had prearranged pickup spots, mainly at senior homes
10 where previously I canvassed. So I don't -- I mean, I was at
11 the nomination meeting shaking hands, but I have reason to
12 believe that it was prearranged and then it wasn't them
13 driving around the neighbourhood picking up random people.

14 **MR. GIB van ERT:** How many stops did they
15 make?

16 **MR. HAN DONG:** I don't know.

17 **MR. GIB van ERT:** Are you -- have you made
18 any investigations into it? You know this has been hanging
19 over you for nearly a year, or more than a year now. Have
20 you made any investigations into how many stops these buses
21 made; whether they stayed in the riding or not?

22 **MR. HAN DONG:** So to the best of my
23 knowledge, there are three senior homes that -- actually,
24 maybe two senior homes, they would have picked up senior with
25 prearrangement.

26 **MR. GIB van ERT:** And you're sitting here now
27 and telling the Commissioner, with confidence, that that is
28 true?

1 **MR. HAN DONG:** Yes, yes.

2 **MR. GIB van ERT:** Have you sought to obtain
3 any manifests or any documents about these buses to know for
4 sure where they travelled, where they stopped, who they
5 picked up?

6 **MR. HAN DONG:** No, I -- you know, again, I'm
7 going by memory and that's what my -- that's what I remember.

8 **MR. GIB van ERT:** You're going by memory.

9 **MR. HAN DONG:** It was arranged to pick up
10 seniors at their senior homes.

11 **MR. GIB van ERT:** According to your memory?

12 **MR. HAN DONG:** According to my memory.

13 **MR. GIB van ERT:** And you don't have any
14 documents to confirm your memory?

15 **MR. HAN DONG:** I don't have any documents.

16 **MR. GIB van ERT:** And you haven't sought to
17 obtain any documents?

18 **MR. HAN DONG:** Not my job as a candidate, and
19 that's -----

20 **MR. GIB van ERT:** Well, your job at the
21 moment, sir, is to give evidence to a judicial inquiry.

22 **MR. HAN DONG:** Yeah.

23 **MR. GIB van ERT:** Have you made any efforts
24 to find documents to back up your memory? Which at times
25 seems a little weak, if you don't mind me saying.

26 **MR. HAN DONG:** I do my best to -- but I have
27 not -- I have not, you know, asked for any document to prove
28 where the bus stops were.

1 **MR. GIB van ERT:** Sir, did you go to New York
2 in the summer of 2019?

3 **MR. HAN DONG:** Twenty nineteen (2019)?

4 **MR. GIB van ERT:** Yes.

5 **MR. GIB van ERT:** No, I travelled to New York
6 earlier than that. I think I remember it was -- like, the
7 weather was cold; earlier in 2019.

8 **MR. GIB van ERT:** Sorry; earlier than 2019?

9 **MR. HAN DONG:** No, no, earlier in 2019.

10 **MR. GIB van ERT:** Oh, earlier.

11 **MR. HAN DONG:** Probably -- I can't -- I don't
12 remember which month, but I remember it was -- like, it was
13 colder.

14 **MR. GIB van ERT:** All right. At some point
15 in 2019 you were in new York. Did you have a meeting while
16 you were there with an official of the PRC's United Front
17 Work Department?

18 **MR. HAN DONG:** No.

19 **MR. GIB van ERT:** Are you sure?

20 **MR. HAN DONG:** Yes.

21 **MR. GIB van ERT:** Have you ever met someone
22 from the United Front Work Department?

23 **MR. HAN DONG:** No, not to my recollection.

24 **MR. GIB van ERT:** All right.

25 Finally, sir, in your Statement of
26 Anticipated Evidence, you seem to express some disappointment
27 or frustration that a conversation you had with the Consul
28 General in Toronto was recorded. You recall that?

1 **MR. HAN DONG:** I don't -- we can -- I mean, I
2 don't ---

3 **MR. GIB van ERT:** Well, let me put it to you
4 this way.

5 **MR. HAN DONG:** I don't know which sentence
6 you're referring to.

7 **MR. GIB van ERT:** Let me put it to you this
8 way. Do you have any objection to having had a phone
9 conversation with this official recorded?

10 **MR. HAN DONG:** I think it's common -- it's
11 reasonable to assume that, you know, any Canadian having
12 their -- if that's true, having their phone tapped it would
13 not be very appreciative, it doesn't matter who they're
14 talking to.

15 **MR. GIB van ERT:** Yes, of course you don't
16 know whether your phone was tapped or whether instead ---

17 **MR. HAN DONG:** I don't.

18 **MR. GIB van ERT:** --- whether instead the
19 phone of the person you were speaking to was tapped.

20 **MR. HAN DONG:** I don't. I don't know that.
21 But I don't know if that's true, if my phone was listened to
22 by somebody.

23 **MR. GIB van ERT:** Thank you. You've been
24 very helpful.

25 **COMMISSIONER HOGUE:** Thank you.

26 Before you start, I have one question. Do I
27 have to understand that the two buses that have been rented
28 by your wife were used to transport senior citizens?

1 **MR. HAN DONG:** Yes.

2 **COMMISSIONER HOGUE:** Okay. The two of them?

3 **MR. HAN DONG:** Two of them.

4 **COMMISSIONER HOGUE:** Thank you.

5 **MR. HAN DONG:** Let me just additional; they
6 were arranged to pick up seniors, but we didn't turn away
7 anybody who wants to get on the bus and go to the nomination
8 votes. So we don't turn away. That's my understanding.

9 **COMMISSIONER HOGUE:** It's your turn now.

10 **MR. NANDO de LUCA:** Thank you.

11 **--- CROSS EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

12 **MR. NANDO de LUCA:**

13 **MR. NANDO de LUCA:** Mr. Dong, have you
14 received any subpoena or summons from the Commission to
15 provide your evidence here today or to provide any documents
16 or information in connection with this Inquiry?

17 **MR. HAN DONG:** I think I was summoned to come
18 here and be a witness.

19 **MR. NANDO de LUCA:** Okay. And when was that,
20 sir?

21 **MR. HAN DONG:** I read the summons yesterday.

22 **MR. NANDO de LUCA:** Sorry?

23 **MR. HAN DONG:** I read the summons yesterday.

24 **MR. NANDO de LUCA:** Is that, to your
25 understanding, the first time you received it or you ---

26 **MR. HAN DONG:** First time I have seen it,
27 yeah.

28 **MR. NANDO de LUCA:** Okay.

1 **MR. HAN DONG:** Probably received it earlier
2 by my, you know, lawyers, but....

3 **MR. NANDO de LUCA:** Okay. And it's been
4 widely reported that the Canadian security officials reported
5 foreign interference concerns surrounding your nomination
6 campaign in the fall of 2019. You've heard evidence about
7 that today, and I believe on previous days. You're aware of
8 those reports?

9 **MR. HAN DONG:** Are you referring to media
10 reports?

11 **MR. NANDO de LUCA:** Yes, among others.

12 **MR. HAN DONG:** Yes.

13 **MR. NANDO de LUCA:** Okay. And my question to
14 you is were any such concerns about your nomination process
15 or your campaign's nomination, were they raised with you or
16 discussed with your campaign during 2019?

17 **MR. HAN DONG:** Sorry, I don't understand your
18 question.

19 **MR. NANDO de LUCA:** Did anyone, for example,
20 CSIS, the RCMP, or any other police or security agencies,
21 discuss with you or your campaign irregularities relating to
22 the 2019 nomination contest?

23 **MR. HAN DONG:** No.

24 **MR. NANDO de LUCA:** Okay. And did any
25 individuals that work for the Liberal Party, or in the Prime
26 Minister's Office, discuss any concerns about irregularities
27 regarding that nomination process with you or your campaign
28 in 2019?

1 in his nomination."

2 Do you see that?

3 **MR. HAN DONG:** I see that.

4 **MR. NANDO de LUCA:** Okay. I want to ask you
5 some questions about that.

6 **MR. HAN DONG:** Sure.

7 **MR. NANDO de LUCA:** First, were you ever
8 contacted by Mr. Johnston or anyone on his behalf in
9 connection with his investigation that led to his first
10 report?

11 **MR. HAN DONG:** No.

12 **MR. NANDO de LUCA:** And would you agree with
13 Mr. Johnston's suggestion that you were not personally aware
14 of any irregularities or the PRC Consulate's potential
15 involvement in your nomination?

16 **MR. HAN DONG:** I agree with that.

17 **MR. NANDO de LUCA:** Okay. And Mr. Johnston,
18 if we go back to page 23, he also, same -- last paragraph, he
19 also says the following:

20 "[The]irregularities were observed
21 with Mr. Dong's nomination in 2019,
22 and there is well-grounded suspicion
23 that the irregularities were tied to
24 the PRC Consulate in Toronto, with
25 whom Mr. Dong maintains
26 relationships."

27 Do you see that statement?

28 **MR. HAN DONG:** Yes, I do.

1 **MR. NANDO de LUCA:** Okay. Do you agree with
2 the statement?

3 **MR. HAN DONG:** I -- I don't know what I'm
4 agreeing to because I don't know -- I'm not -- I am not privy
5 to any documents that supports this statement. So ---

6 **MR. NANDO de LUCA:** Okay, so let's break it
7 up a little bit.

8 **MR. HAN DONG:** --- I don't know.

9 **MR. NANDO de LUCA:** Do you agree -- do you
10 know what irregularities Mr. Johnston is referring to?

11 **MR. HAN DONG:** I don't.

12 **MR. NANDO de LUCA:** And do you know who
13 observed them?

14 **MR. HAN DONG:** I don't.

15 **MR. NANDO de LUCA:** Do you know what the
16 irregularities were that were tied to the PRC Consulate in
17 Toronto?

18 **MR. HAN DONG:** I don't.

19 **MR. NANDO de LUCA:** What about the last
20 statement? Is it correct that you maintain relationships
21 with individuals at the PRC Consulate in Toronto?

22 **MR. HAN DONG:** Yeah. I agree with that,
23 yeah.

24 **MR. NANDO de LUCA:** Okay. Who in particular?
25 Can you give us some names?

26 **MR. HAN DONG:** I had a conversation with
27 Consular General Han Tao. You know, his office will call my
28 office to arrange a phone call and we talk, and especially

1 around the Chinese holidays. Yeah.

2 **MR. NANDO de LUCA:** Anyone else of note that
3 you regularly stay in contact with?

4 **MR. HAN DONG:** No. No, not -- nothing --
5 nobody I recall that I would have any conversation with.

6 **MR. NANDO de LUCA:** Okay. Now, Mr. Johnston
7 has been quoted in the press as indicating that the reason he
8 did not contact you regarding his first report is because he
9 was aware that you had litigation outstanding against the
10 Global News Corporation and Corus Entertainment regarding
11 stories they ran about you suggesting that you were somehow
12 involved in the foreign interference campaign. Do you know
13 anything about that?

14 **MR. HAN DONG:** I vaguely remember that.

15 **MR. NANDO de LUCA:** Okay. So I understand
16 that Mr. Johnston didn't actually speak with you, but were
17 there any attempts to speak with you? Did he or his staff
18 ask for an interview?

19 **MR. HAN DONG:** Not to -- not to my knowledge.

20 **MR. NANDO de LUCA:** Okay. Is it correct that
21 you commenced such litigation against Global and Corus?

22 **MR. HAN DONG:** Yes. We're -- the matter is
23 before the court.

24 **MR. NANDO de LUCA:** Okay. And what stage is
25 that at, sir?

26 **MR. HAN DONG:** We're in discovery.

27 **MR. NANDO de LUCA:** Okay. Has a trial date
28 been set?

1 **MR. HAN DONG:** I don't -- I -- I'm not sure
2 if we -- I can ---

3 **MR. NANDO de LUCA:** You don't know?

4 **MR. HAN DONG:** I don't know.

5 **MR. NANDO de LUCA:** Okay. And Mr. Dong,
6 switching subjects. On February 22, 2021, there was a motion
7 that passed in the commons by a vote of 266 to 0 on a multi-
8 party basis. It was a motion sponsored by MP Michael Chong,
9 which basically recognised that the PRC had engaged in acts
10 of genocide against the Uyghurs and other Turkic Muslims, and
11 condemning such actions. Do you recall that motion, sir?

12 **MR. HAN DONG:** I recall that motion.

13 **MR. NANDO de LUCA:** Okay. You didn't vote on
14 that motion did you?

15 **MR. HAN DONG:** I don't think I did. I
16 abstained.

17 **MR. NANDO de LUCA:** And why didn't you vote
18 in connection with that motion, sir?

19 **MR. HAN DONG:** Because I haven't seen any --
20 I haven't seen documents to convince me yes, there is a
21 genocide, or no, there isn't a genocide.

22 **MR. NANDO de LUCA:** Okay.

23 **MR. HAN DONG:** So I think the fair thing for
24 me to do is to abstain.

25 **MR. NANDO de LUCA:** Okay. So your abstention
26 was deliberate in a sense, it was a conscious decision to
27 abstain?

28 **MR. HAN DONG:** Yeah.

1 **MR. NANDO de LUCA:** Okay. And isn't also
2 correct that two years later, on February 1, 2023, there was
3 a Liberal private members motion which built on Mr. Chong's
4 original motion also condemning the treatment of Uyghurs ---

5 **MR. MATTHEW FERGUSON:** Commissioner, I
6 believe we're approaching or outside of the scope of this ---

7 **COMMISSIONER HOGUE:** I'm sorry. I was
8 looking at ---

9 **MR. MATTHEW FERGUSON:** Matthew Ferguson for
10 Commission Counsel. I believe we're a bit outside of the
11 scope at this point.

12 **COMMISSIONER HOGUE:** I tend to agree. So
13 maybe you can explain where you're going.

14 **MR. NANDO de LUCA:** Well ---

15 **MR. GREGORY TZEMENAKIS:** If I may,
16 Commissioner. I want to remind my friend that he is
17 venturing into parliamentary privilege. The member benefits
18 from privilege of the house, including his thought process
19 and his deliberations as to why he did or did not vote in
20 respect of a particular matter, and that privilege should be
21 respected by the member and by the Commission, please, and my
22 friend.

23 **MR. NANDO de LUCA:** With respect, on the
24 privilege point, I'm not asking him to disclose what he said
25 or didn't say in the house. I'm asking for matters of record
26 and what his reasoning was. With respect to the relevance
27 point, I think it's relevant to understand and for this
28 Commission to know the extent to which -- in connection with

1 the issues that the Commission is considering foreign
2 interference, the extent to which Mr. Dong has been prepared
3 to or not to speak out against foreign actors such as the
4 PRC.

5 **COMMISSIONER HOGUE:** He gave -- he already
6 gave the answer in terms of why he didn't vote in favour of
7 the motion that had been presented. So I suggest that you
8 move on another topic.

9 **MR. NANDO de LUCA:** Okay. Can I get an
10 answer to the question about the second follow up motion, the
11 Liberal motion, to follow on Mr. Chong. Did you vote on that
12 one, sir?

13 **MR. HAN DONG:** Which motion are you talking
14 about?

15 **MR. NANDO de LUCA:** There was a motion
16 presented, a private members motion, on February 1, 2023,
17 which ---

18 **MR. HAN DONG:** I think my voting record is
19 public, and you can find out how I voted.

20 **MR. NANDO de LUCA:** Okay, fair enough.
21 Sir, you resigned from the Liberal caucus on
22 March 2023?

23 **MR. HAN DONG:** Yeah.

24 **MR. NANDO de LUCA:** Okay. And did you
25 discuss resigning with anyone from the Liberal Party, the
26 Prime Minister's Office, or any other minister's office?

27 **MR. HAN DONG:** Not with -- not with PMO.

28 **MR. NANDO de LUCA:** Sorry, I didn't

1 understand the last ---

2 **MR. HAN DONG:** Not with the Prime Minister's
3 Office.

4 **MR. NANDO de LUCA:** What about anyone else in
5 the Liberal Party?

6 **MR. HAN DONG:** I definitely talked to the
7 whip.

8 **MR. NANDO de LUCA:** Sorry?

9 **MR. HAN DONG:** I talked to the whip.

10 **MR. NANDO de LUCA:** Okay.

11 **MR. HAN DONG:** You know, I went to the House
12 and made a statement. So.

13 **MR. NANDO de LUCA:** That was your ultimate
14 decision. In terms of the wisdom or not of resigning from
15 caucus, was that informed -- was your decision informed by
16 anyone other than you?

17 **MR. MARK POLLEY:** Sorry, with respect to my
18 friend, again I think we're in the same territory that is
19 outside the scope. So I join the other calls for my friend
20 to stay inside.

21 **MR. NANDO de LUCA:** The fact of the matter
22 is, Your Honour, that the witness has resigned from caucus
23 amid these allegations, and I think it's relevant to
24 understand whether or not the Liberal Party agrees, shares in
25 the concerns, or not, being one of the actors that's
26 implicated, or that's at least involved in these concerns
27 about foreign election interference.

28 **COMMISSIONER HOGUE:** I permit the question

1 but it's going to be the last one, because your time is over.
2 But I permit this question. So you have to answer.

3 **MR. HAN DONG:** What's the -- could you
4 restate the question?

5 **MR. NANDO de LUCA:** Sir, I'll move -- the
6 question related to -- was a lead-in to the following.

7 You've been out of caucus since March 2023.
8 You've indicated in the press that you hope to rejoin caucus
9 and that you also had a meeting with Minister LeBlanc back in
10 September expressing the hope that you would rejoin caucus,
11 and he indicated that he would speak to the Prime Minister
12 about it.

13 Has anything come of that discussion?

14 **MR. HAN DONG:** No, I don't have anything to
15 share on that.

16 **MR. NANDO de LUCA:** You're still out of the
17 caucus though; correct?

18 **MR. HAN DONG:** I'm an independent member.
19 Yes.

20 **MR. NANDO de LUCA:** And do you wish to rejoin
21 caucus, sir? Old question. It's that same question. You're
22 now prepared to answer it?

23 **MR. HAN DONG:** Yeah, I'm prepared to rejoin
24 the caucus.

25 **MR. NANDO de LUCA:** Sorry, I didn't hear
26 that. Sorry.

27 **MR. HAN DONG:** I'm prepared to rejoin the
28 caucus.

1 **MR. NANDO de LUCA:** Would you like to is what
2 I asked.

3 **MR. HAN DONG:** Oh, I thought you asked me if
4 I'm prepared. Yes, I would.

5 **MR. NANDO de LUCA:** Okay. Thank you.
6 Those are my questions. Thank you.

7 **COMMISSIONER HOGUE:** Thank you.
8 So Human Rights Coalition.

9 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

10 **MS. SARAH TEICH:**

11 **MS. SARAH TEICH:** Good afternoon, Mr. Dong.

12 **MR. HAN DONG:** Good afternoon.

13 **MS. SARAH TEICH:** I want to dig a bit more
14 into the allegations of coercion. In cross-examination of
15 the panel this morning, Mr. Ishmael agreed that although the
16 ballot box is secret, it may be possible for authoritarian
17 regimes to find out how someone voted, and he agreed that
18 even the fear of these possibilities might make members of
19 diaspora communities vulnerable to coercion in a nomination
20 race or election. Do you agree with him?

21 **MR. HAN DONG:** That's a long sentence. There
22 are a lot of elements to it. I guess everything -- anything
23 is possible.

24 **MS. SARAH TEICH:** Do you believe this could
25 have happened in the context of your nomination contest?

26 **MR. HAN DONG:** Again, it's possible, but I
27 didn't see any evidence to support that.

28 **MS. SARAH TEICH:** If it happened, would you

1 have seen evidence of it?

2 **MR. HAN DONG:** Not necessarily. But like I
3 said, I haven't seen any evidence.

4 **MS. SARAH TEICH:** Does your campaign staff
5 screen volunteers?

6 **MR. HAN DONG:** What do you mean, screen?

7 **MS. SARAH TEICH:** Do they screen -- do they
8 conduct background checks?

9 **MR. HAN DONG:** No, we don't conduct
10 background checks. I mean, they ask questions. You know,
11 their name, you know, their availability, what they like to
12 do. This kind of stuff.

13 **MS. SARAH TEICH:** Does that check look into
14 the issue of foreign interference?

15 **MR. HAN DONG:** I don't believe so. Not the
16 2019 nomination. No, I don't believe so.

17 **MS. SARAH TEICH:** Do you think it would be
18 valuable to do that in the future?

19 **MR. HAN DONG:** Sure. But I don't know what
20 that means, so I don't know what -- like, are you saying that
21 you requiring every candidate's campaign to do background
22 checks on their volunteers?

23 **MS. SARAH TEICH:** I don't know what other
24 campaigns do. I'm asking you ---

25 **MR. HAN DONG:** I don't know ---

26 **MS. SARAH TEICH:** All right.

27 **MR. HAN DONG:** --- what that means. Yeah.

28 **MS. SARAH TEICH:** Well I'm asking you if you

1 think it would be valuable for your campaign to look into
2 this issue as part of its screening next time?

3 **MR. HAN DONG:** I think that's something to be
4 kept in mind. Yeah.

5 **MS. SARAH TEICH:** All right. No further
6 questions. Thank you.

7 **MR. HAN DONG:** Thank you.

8 **COMMISSIONER HOGUE:** Thank you.

9 It's now for Government of Canada.

10 **MS. TAWNI PROCTOR:** We have no questions.

11 **COMMISSIONER HOGUE:** No questions. And for
12 counsel for Mr. Dong.

13 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

14 **MR. MARK POLLEY:**

15 **MR. MARK POLLEY:** So, Mr. Dong, let's start
16 with this question. The series of questions around busses.
17 I mean, you remember Mr. Van Ert asked you some questions
18 about whether you might have documents and records of who was
19 on busses. Do you remember him asking you those questions?

20 **MR. HAN DONG:** Yes.

21 **MR. MARK POLLEY:** And he also raised the
22 issue of -- talked about where the bus might have stopped as
23 well. Had you ever -- have you been asked that question
24 before, about where busses stopped? Where the busses rented
25 by your campaign may have stopped?

26 **MR. HAN DONG:** Have I ever been asked that
27 question?

28 **MR. MARK POLLEY:** Yeah.

1 **MR. HAN DONG:** Not that I recall.

2 **MR. MARK POLLEY:** And the question of who was
3 on the busses that your campaign rented, was anyone asking
4 you that question at any time before today?

5 **MR. HAN DONG:** No, I don't recall right now.
6 But I know the bus was rented for seniors.

7 **MR. MARK POLLEY:** All right. And did -- was
8 anyone asking you to see if you could go find documents, as
9 Mr. Van Ert suggested you could go find documents? Before
10 today, was anyone asking you that question?

11 **MR. HAN DONG:** No.

12 **MR. MARK POLLEY:** Okay. And you raised a
13 point, I think it was in response to the Commissioner's
14 question to you, which was you said something about a picture
15 that came from your social media. What did you mean by that?

16 **MR. HAN DONG:** Well in the -- in a February
17 news article, various pictures were used. I recall a few
18 pictures with students holding my signs in front of a bus
19 with myself. I recognized those -- that picture. And a
20 couple others were taken off of my social media.

21 **MR. MARK POLLEY:** And when you ---

22 **MR. HAN DONG:** Facebook.

23 **MR. MARK POLLEY:** --- read the -- sorry.

24 **MR. HAN DONG:** Facebook.

25 **MR. MARK POLLEY:** Facebook. And when you
26 read the article and looked at the picture, what was -- was
27 there something wrong with the picture in terms of the
28 article?

1 **MR. HAN DONG:** Yeah, obviously, for example,
2 the signs had my name and the Liberal Party logo at the
3 bottom. It's a clear indication that was after nomination,
4 after I was nominated. So it has nothing to do with the
5 nomination. And I recognized these pictures were taken after
6 September 12th.

7 **MR. MARK POLLEY:** All right. And so -- and
8 where did that lead you in terms of trying to figure out this
9 issue about busses?

10 **MR. HAN DONG:** Well I asked my campaign --
11 people who worked on my campaign, including my wife, you
12 know, "Do you have any recollection of a bus rental and what
13 not?" And we found out that there were two busses rented and
14 the expenses were filed with Elections Canada, and that's
15 been documented.

16 **MR. MARK POLLEY:** Okay. And so were any
17 busses rented by your campaign to transport foreign
18 international students?

19 **MR. HAN DONG:** Not to my knowledge.

20 **MR. MARK POLLEY:** And again, we heard about a
21 bus, or busses, that transported foreign international
22 students, potentially. Did your campaign organize that or
23 pay for that, as far as you know?

24 **MR. HAN DONG:** As far as I know, no.

25 **MR. MARK POLLEY:** And you were asked
26 questions about where you canvassed and campaigned. Do you
27 ever campaign outside of your riding in terms of a nomination
28 contest?

1 **MR. HAN DONG:** No.

2 **MR. MARK POLLEY:** Sorry, in 2019, did you
3 ever campaign for any purpose outside of your riding?

4 **MR. HAN DONG:** No. That's a waste of time.

5 **MR. MARK POLLEY:** And do you know of any non-
6 residents from your riding that managed to vote in your
7 nomination?

8 **MR. HAN DONG:** People who don't live in the
9 riding?

10 **MR. MARK POLLEY:** Right.

11 **MR. HAN DONG:** No.

12 **MR. MARK POLLEY:** And did you know -- again,
13 as you -- either at the time or when you dug it into it over
14 the period since these newspaper articles came out, have you
15 ever learned of any breaking of the rules by anyone on your
16 campaign?

17 **MR. HAN DONG:** No.

18 **MR. MARK POLLEY:** And have you investigated
19 that? Have you asked questions to try to figure that out?

20 **MR. HAN DONG:** Yeah. I checked with my key
21 campaign workers, such as CFO and, you know, campaign
22 manager. Yeah.

23 **MR. MARK POLLEY:** You also heard a
24 suggestion, or you saw it up on the screen in a document you
25 saw today, I think for the first time, but, about fake IDs,
26 that someone -- that people were given fake IDs. Have you
27 ever heard that that happened on your -- during your
28 nomination?

1 **MR. HAN DONG:** No.

2 **MR. MARK POLLEY:** And what would happen if
3 you did find out about something like that?

4 **MR. HAN DONG:** I would be the first one
5 condemning it. I think it's an insult to our democratic
6 system. I think if someone wants to use that to take
7 advantage of the process, then I'll be the first one
8 condemning it.

9 **MR. MARK POLLEY:** Let's talk about the "Two
10 Michaels" topic that you were asked about as well.

11 So you've talked about talking to people at
12 the -- well, the Consul General, for example. Why would you
13 ever be talking to the Consul General?

14 **MR. HAN DONG:** As a member of a riding that
15 has a large portion of Chinese Canadian residents, it's part
16 of my job. I see it as part of my job to talk to foreign
17 diplomats, PRC in this case.

18 **MR. MARK POLLEY:** Why is that part of your
19 job?

20 **MR. HAN DONG:** One is to exchange, you know,
21 you know, views on the state of, say anti-Asian racism. I
22 think that's a common interest.

23 The other thing, from time to time we help
24 constituents to obtain visas, advocate on their behalf if
25 they face difficulties with their local consulate. Yeah, so
26 my office will act in that capacity.

27 **MR. MARK POLLEY:** And so that's connected to
28 you being an MP, you're saying?

1 conversation with, not the current, but the previous High
2 Commissioner to Sri Lanka, as well as I'm an executive on the
3 Canada-Ukrainian Friendship Group. So I've had opportunity
4 to meet with Ukrainian Parliamentarians and Diplomats.

5 **MR. MARK POLLEY:** And last, when we talk
6 about -- talked about the call you may have had with the
7 Consul General at some point, that we saw details reported on
8 the screen again, you said that conversation would have been
9 in Mandarin?

10 **MR. HAN DONG:** Most likely, yes.

11 **MR. MARK POLLEY:** Okay. And at any time,
12 would you ever have been saying to the Consul General --
13 well, sorry, let me ask it this way. Did you -- what was
14 your message to him when you talked about the "Two Michaels"?

15 **MR. HAN DONG:** I've always advocated for
16 their early release and improvement of their condition, and
17 you know, I would -- when Chinese Diplomats, including him,
18 compare the "Two Michael" case with Meng Wanzhou, who was
19 detained at the time, I would have pointed out the difference
20 in judicial process after lack of transparency on the Chinese
21 part.

22 **MR. MARK POLLEY:** Okay. I have no further
23 questions. Thank you.

24 **COMMISSIONER HOGUE:** Thank you.
25 Re-examination, Maître Krongold?

26 **MR. KRONGOLD:** No. Thank you.

27 **COMMISSIONER HOGUE:** No re-examination. So
28 it's time for a break. We'll come back at 4:20.

1 **THE REGISTRAR:** Order, please. À l'ordre,
2 s'il vous plaît.

3 This hearing is in recess until 4:20. La
4 séance est en pause jusqu'à 16 h 20.

5 --- Upon recessing at 4:20 p.m./

6 --- La séance est suspendue à 16 h 20

7 --- Upon resuming at 4:21 p.m./

8 --- La audience est reprise à 16h21

9 **THE REGISTRAR:** Order please. À l'ordre,
10 s'il vous plait.

11 This sitting of the Foreign Interference
12 Commission is back in session. Cette séance de la Commission
13 sur l'ingérence étrangère a repris.

14 **MR. HOWARD KRONGOLD:** Thank you,
15 Madam Commissioner.

16 The Commission's next witness is Ted Lojko.
17 If the witness could please be sworn.

18 **THE REGISTRAR:** Good afternoon. Could you
19 please state your name and your -- spell your last name for
20 the record, please?

21 **MR. TED LOJKO:** Sure. My name is Ted Lojko.
22 The last name is L-O-J-K-O.

23 --- MR. TED LOJKO, Sworn/Assermenté:

24 --- EXAMINATION IN-CHIEF BY/INTERROGATOIRE EN CHEF PAR

25 MR. HOWARD KRONGOLD:

26 **MR. HOWARD KRONGOLD:** Could you please bring
27 up document WIT 21.

28 Mr. Lojko, you were interviewed by Commission

1 Counsel on about March 5th, 2024?

2 MR. TED LOJKO: Yeah.

3 MR. HOWARD KRONGOLD: All right. And this
4 interview summary you're looking at here was generated from
5 that interview?

6 MR. TED LOJKO: Correct.

7 MR. HOWARD KRONGOLD: Have you reviewed the
8 interview summary for accuracy?

9 MR. TED LOJKO: I have.

10 MR. HOWARD KRONGOLD: All right. And is it
11 accurate to the best of your knowledge, information, and
12 belief?

13 MR. TED LOJKO: It is.

14 MR. HOWARD KRONGOLD: Okay. Do you have any
15 corrections, additions, or deletions you would like to make
16 to the summary?

17 MR. TED LOJKO: No, I do not.

18 MR. HOWARD KRONGOLD: All right. And will
19 you adopt it as part of your evidence before the Commission?

20 MR. TED LOJKO: Sure.

21 MR. HOWARD KRONGOLD: I just want to turn
22 very briefly to your background, sir. You've been involved
23 in electoral politics since the mid 1970s. Is that right?

24 MR. TED LOJKO: Approximately, yes.

25 MR. HOWARD KRONGOLD: Okay. And you've
26 worked on over 30 provincial and federal nomination and
27 election campaigns. Is that right?

28 MR. TED LOJKO: Correct.

1 **MR. HOWARD KRONGOLD:** And I understand you've
2 worked, perhaps mainly with Liberal candidates, but also with
3 candidates from the Conservative and NDP from time to time?

4 **MR. TED LOJKO:** I help people that I believe
5 should be getting elected, yes.

6 **MR. HOWARD KRONGOLD:** Okay. So I'm sorry,
7 maybe assisted the campaigns but didn't work for them. Is
8 that ---

9 **MR. TED LOJKO:** sorry?

10 **MR. HOWARD KRONGOLD:** You assisted those
11 campaigns but you didn't work on them, work for them? Is
12 that ---

13 **MR. TED LOJKO:** I assisted on those
14 campaigns, but yes, I did not work for them, no.

15 **MR. HOWARD KRONGOLD:** Okay, fair enough. I
16 understand you were Han Dong's campaign manager when he ran
17 to be an MPP in Ontario in both 2014 and 2018?

18 **MR. TED LOJKO:** Correct.

19 **MR. HOWARD KRONGOLD:** And in 2019, you were
20 Mr. Dong's campaign manager in his bid for the federal seat
21 in Don Valley North?

22 **MR. TED LOJKO:** Correct.

23 **MR. HOWARD KRONGOLD:** And that you were his
24 campaign manager both in the nomination contest and in the
25 general election?

26 **MR. TED LOJKO:** Yes.

27 **MR. HOWARD KRONGOLD:** And finally, you were
28 his campaign manager in his successful bid for re-election in

1 2021?

2 **MR. TED LOJKO:** Correct.

3 **MR. HOWARD KRONGOLD:** Right. And I
4 understand that you still do some part time communications
5 work for Mr. Dong's parliamentary office?

6 **MR. TED LOJKO:** On a part-time basis, yes.

7 **MR. HOWARD KRONGOLD:** Right. I want to ask
8 you about the voting rules in a Liberal Party of Canada
9 nomination race in 2019. How familiar are you with the --
10 with what the nomination rules were in 2019 for Liberal Party
11 candidates?

12 **MR. TED LOJKO:** Fairly familiar.

13 **MR. HOWARD KRONGOLD:** Okay. And why is that?

14 **MR. TED LOJKO:** As the campaign manager, you
15 are responsible to make sure that the rules are adhered to
16 and the timeframe is adhered to, and that all people involved
17 also understand the rules.

18 **MR. HOWARD KRONGOLD:** Right. And do
19 campaigns and nomination contests have scrutineers?

20 **MR. TED LOJKO:** Yes. All nominations have
21 scrutineers from both parties, as well as the -- well, the
22 Liberal Party also has their scrutineers.

23 **MR. HOWARD KRONGOLD:** Yes. And would you be
24 involved in consulting with scrutineers if rules issues came
25 up in the course of the nomination campaign?

26 **MR. TED LOJKO:** No. That is normally the
27 role of the chief scrutineer, which basically the candidate
28 appoints. But they -- I sit through those briefings when he

1 outlines the parameters of who is eligible to vote, yes.

2 **MR. HOWARD KRONGOLD:** Okay. One thing I
3 noticed in your interview summary is that you say that you
4 believe that international students would not have been
5 eligible to vote in the 2019 Liberal nomination contest
6 unless they were living on their own.

7 **MR. TED LOJKO:** So we would be canvassing
8 door-to-door. We would sign up individuals that wanted to
9 become members, but realistically, unless they were permanent
10 residents and had some form of ID, they would not be eligible
11 to vote.

12 **MR. HOWARD KRONGOLD:** Okay. And you -- do
13 you think that an international student would be eligible to
14 use an address from their educational institution, from like
15 an -- a residence from an educational institution?

16 **MR. TED LOJKO:** So some of the international
17 students may be permanent residents, but international
18 students, as an international student without any permanent
19 residency in Canada would not be eligible to vote and they
20 would be blocked at -- within the voting room.

21 **MR. HOWARD KRONGOLD:** So is it your
22 understanding that a student would have to be a permanent
23 resident of Canada to vote in a Liberal nomination contest in
24 2019?

25 **MR. TED LOJKO:** Permanent resident not only
26 of Canada, a permanent resident of Don Valley North, yes.

27 **MR. HOWARD KRONGOLD:** And how would someone
28 demonstrate their residency in order to qualify for the

1 Liberal nomination contest?

2 **MR. TED LOJKO:** So they may have signed up as
3 a member of the Liberal Party, but when they go to vote, they
4 would go to the specific voting station based on their last
5 name, and at that point they would have to show a piece of ID
6 with their name and their address.

7 **MR. HOWARD KRONGOLD:** Okay. I know that the
8 phrase "permanent resident" is used in a legal context.
9 Would a voter have to show like a document from the
10 Government of Canada showing they were actually a permanent
11 resident in the federal law sense of the word?

12 **MR. TED LOJKO:** No. The Elections Canada
13 Rules would kick in at that point. So a person could
14 actually swear that they were a permanent resident, but
15 realistically if they had a driver's licence, and they had
16 their name, and they basically wanted to vote, quite honestly
17 the party -- and if they were on the party list, they would
18 be eligible to vote.

19 **MR. HOWARD KRONGOLD:** Okay. Well, what about
20 vouching?

21 **MR. TED LOJKO:** Sorry?

22 **MR. HOWARD KRONGOLD:** What about the vouching
23 rules?

24 **MR. TED LOJKO:** The vouching rules only --
25 the vouching rules are only there for somebody that knows the
26 other person well. So if your spouse came in and you were a
27 eligible voter and you had proper ID, you could vouch for
28 your spouse and say that "she left or he left their ID at

1 home and they live with me." And then you can actually go to
2 credentials, not at the actual voting station, at the
3 credential station, to vouch for that particular person, and
4 they would then be eligible to vote based on the fact and
5 eligible voter with proper ID was vouching for them.

6 **MR. HOWARD KRONGOLD:** And what about using
7 like a piece of mail to demonstrate your place of residence?
8 Is that something that's permissible?

9 **MR. TED LOJKO:** Under the Elections Canada
10 Rules, there is -- any government ID or any official letters,
11 I guess, are valid to show your residency, yes.

12 **MR. HOWARD KRONGOLD:** Okay. And are the --
13 are those Elections Canada Rules also the ones applicable in
14 a Liberal nomination contest?

15 **MR. TED LOJKO:** The nominations are governed
16 by Elections Canada, yes.

17 **MR. HOWARD KRONGOLD:** Okay. What do you mean
18 they're governed by Elections Canada?

19 **MR. TED LOJKO:** We have to abide by the Rules
20 of Elections Canada, both -- not only in the procedures but
21 also in the financial reporting.

22 **MR. HOWARD KRONGOLD:** I just want to make
23 sure I understand your evidence properly.

24 Could we go to paragraph 16 of WIT 21. So
25 just right at the bottom of page 3. I'm sorry -- yes,
26 paragraph 16. Thank you.

27 So what it indicates there is:

28 "Mr. Lojko believed that

1 international students would not be
2 eligible to vote in the nomination
3 contest unless they could prove they
4 were living on their own with an
5 address in the area. Liberal Party
6 rules required documented proof of
7 residency within the geographic area
8 (riding). He..."

9 Meaning you:

10 "...thought many international
11 students would not have proof of
12 residency because they would be
13 living in residence with their
14 educational institution."

15 Can you just explain what you meant by that?

16 **MR. TED LOJKO:** Sure. There is a lot of
17 international students that have dual citizenship. They are
18 permanent residents or their parents are permanent residents,
19 but they're also classified as international students. But
20 realistically, somebody living in a residence would have a
21 hard time proving that they actually -- that is their
22 permanent residence. So it would be very difficult to get
23 past credentials at that point.

24 **MR. HOWARD KRONGOLD:** Okay. I wanted to turn
25 to Mr. Dong's nomination campaign when about signing up
26 members in particular of the Chinese Canadian community.

27 **MR. TED LOJKO:** Sure.

28 **MR. HOWARD KRONGOLD:** What can you tell us

1 about what the campaign strategy was?

2 **MR. TED LOJKO:** There were two Chinese
3 Canadian candidates at that time, Han Dong, and the other --
4 and the other candidate. Obviously, the strategy was to look
5 at other ethno-cultural communities that we could tap into,
6 and that is what we focussed on primarily.

7 **MR. HOWARD KRONGOLD:** Okay. The riding of
8 Don Valley North, as I understand it, is around 30 percent
9 Chinese Canadian. Is that ---

10 **MR. TED LOJKO:** Correct.

11 **MR. HOWARD KRONGOLD:** --- your understanding?
12 Okay. Did the campaign try to sign up any Chinese Canadians?

13 **MR. TED LOJKO:** We focussed -- Han and his
14 wife focussed on seniors partially because Han's mother was
15 part of one of the Tai Chi clubs, or whatever else, in
16 through that area there. And they outreached to a couple of
17 the seniors community centres, I guess, as did the other
18 candidate that was seeking the nomination.

19 **MR. HOWARD KRONGOLD:** Okay. And how would
20 that outreach happen? Was it door-to-door, was it soliciting
21 groups? How did it ---

22 **MR. TED LOJKO:** In relation to seniors?

23 **MR. HOWARD KRONGOLD:** Yes.

24 **MR. TED LOJKO:** So normally, we would find
25 out at a community centre when they were having their Tai Chi
26 classes or they were having gatherings at that point, and
27 that's when Han and his wife normally would go and visit them
28 and say that they were seeking -- Han was seeking the

1 nomination.

2 **MR. HOWARD KRONGOLD:** Okay. And is there an
3 advantage to soliciting support from groups instead of
4 individuals door-to-door?

5 **MR. TED LOJKO:** It's easier to get out the
6 vote when you have a group of individuals that need
7 assistance, such as transportation and whatnot, as well as
8 communication. So yeah, there is an advantage to going after
9 groups of individuals rather than going door-to-door. If you
10 go door-to-door very few people actually -- they may sign up
11 the membership, but traditionally speaking very few people
12 actually end up participating in the process.

13 **MR. HOWARD KRONGOLD:** Okay. And is that an
14 issue that nomination campaigns have to deal with, not just
15 signing up voters but getting them out to the vote?

16 **MR. TED LOJKO:** Every nomination and every
17 election has to try to get out the vote. And so they focus
18 on the individuals that they signed up to try to get them to
19 come to the nomination or the election, yes.

20 **MR. HOWARD KRONGOLD:** All right. We've heard
21 evidence today from Mr. Dong that he solicited support from
22 Chinese international students who attended a private high
23 school. Were you aware of him campaigning to solicit the
24 support of international high school students?

25 **MR. TED LOJKO:** I was aware that he was
26 canvassing in different buildings and different areas. I
27 don't believe that he was actually soliciting international
28 students. I think he was basically signing up young people.

1 Whether they were international students or not international
2 students, I don't think he was aware, nor was I aware.

3 **MR. HOWARD KRONGOLD:** Okay. Are you aware of
4 him attending any high schools to solicit support?

5 **MR. TED LOJKO:** Public schools?

6 **MR. HOWARD KRONGOLD:** Private schools,
7 actually.

8 **MR. TED LOJKO:** Private schools? In all
9 honesty, I -- I'm -- I was not aware.

10 **MR. HOWARD KRONGOLD:** Were you aware of him
11 attending any residences where students, high school students
12 included, might be living?

13 **MR. TED LOJKO:** No, but I do know that he did
14 go into various buildings. Anytime that it rained, he would
15 go into various buildings and they would target in areas
16 where we thought the nomination may be occurring, which was
17 obviously the Armenian Centre, possibly around Seneca
18 College, some of the bigger buildings in that area where we
19 anticipated that the party may hold a nomination meeting, and
20 it would be much easier to get people to go around the corner
21 than halfway -- into different areas. So I'm not aware
22 specifically what buildings he went into.

23 **MR. HOWARD KRONGOLD:** Okay. Were those
24 visits that were arranged by the campaign in some way?

25 **MR. TED LOJKO:** Normally, Han canvassed with
26 friends, and it honestly depended on the day or the day of
27 the week when he was going. Normally on a Saturday, he would
28 go to various households. If it's a rainy day, he would go

1 into buildings.

2 **MR. HOWARD KRONGOLD:** Okay. So I'm just
3 trying to understand the distinction here. Is there a
4 distinction between -- when you say "canvassing" I sort of
5 think going door-to-door ---

6 **MR. TED LOJKO:** Yeah.

7 **MR. HOWARD KRONGOLD:** --- as opposed to
8 actual planned events that a candidate might attend. Is
9 there a distinction there?

10 **MR. TED LOJKO:** No. There was no actual
11 planned events as such. There was no group gatherings that -
12 - to my knowledge, but there was, you know, targeted areas
13 that we thought we would be able to sign up members in.

14 **MR. HOWARD KRONGOLD:** Okay. So there were no
15 planned events for anyone that -- where Mr. Dong solicited
16 support for his nomination? Or no ---

17 **MR. TED LOJKO:** With the exception of
18 possibly the seniors Tai Chi class or those types of things,
19 where we knew every Wednesday they would be meeting there, or
20 there may have been some coffee parties at that point, but I
21 have no clue. I'm sorry. I am not aware of any specific
22 gatherings that were arranged by the campaign.

23 **MR. HOWARD KRONGOLD:** Okay. So your
24 understanding is Mr. Dong would have been going sort of door-
25 to-door in these areas where there might have been
26 international students I guess. Is that ---

27 **MR. TED LOJKO:** He would be going door-
28 to-door wherever people lived, yes.

1 **MR. HOWARD KRONGOLD:** Okay. But no planned
2 events with high school students, to your knowledge?

3 **MR. TED LOJKO:** There was no specific plan to
4 go after young people or high school students or
5 international students. We would basically try to solicit
6 whatever memberships we could at that time, yes.

7 **MR. HOWARD KRONGOLD:** Why would a nomination
8 campaign not spend time targeting high school students?

9 **MR. TED LOJKO:** There's a very low voter
10 turnout with younger people. They may or may not sign up
11 memberships. You got to remember that the Liberal Party
12 allows memberships of 14 years of age and over. If the
13 parents sign up a young person, there's a better tendency
14 that those people will come up. If you just go into a high
15 school and standing in front of the high school and just
16 signing up people at that point, your voter turnout it's
17 extremely low.

18 **MR. HOWARD KRONGOLD:** Okay. Do you find that
19 they're enthusiastic and motivated voters? High school
20 students that is.

21 **MR. TED LOJKO:** I don't think high school
22 students really understand the nomination process, they
23 understand the election process and probably get more
24 involved in that than obviously in a nomination.

25 **MR. HOWARD KRONGOLD:** Okay. Mr. Dong told us
26 that someone from the campaign arranged for him to solicit
27 support from high school students from a high school with the
28 initials NOIC. Do you have any knowledge about that

1 occurring?

2 **MR. TED LOJKO:** No, I do not.

3 **MR. HOWARD KRONGOLD:** Okay. Do you think
4 that anyone from the campaign might have made arrangements to
5 do that?

6 **MR. TED LOJKO:** I -- if they were going
7 inside a building, they would have had to have had
8 permission. So that's a possibility, yes.

9 **MR. HOWARD KRONGOLD:** Mr. Dong has also given
10 evidence that he was told that a bus organized -- that their
11 bus was organized that transported some of these students to
12 the nomination meeting and that they voted in the nomination
13 contest. Is that something you recall or know anything
14 about?

15 **MR. TED LOJKO:** I do not recall a bus coming
16 to the nomination meeting specifically with young people, no.

17 **MR. HOWARD KRONGOLD:** Okay. Mr. Dong said
18 that he was told by someone within the campaign about this
19 bus having come to the vote. Did you hear anything about
20 that from anyone on the campaign?

21 **MR. TED LOJKO:** No, I did not.

22 **MR. HOWARD KRONGOLD:** Okay. Have you made
23 any inquiries of other members of the campaign about these
24 subjects?

25 **MR. TED LOJKO:** As of yesterday, yes.

26 **MR. HOWARD KRONGOLD:** Okay. And what did you
27 -- what inquiries did you make?

28 **MR. TED LOJKO:** Most of the people that I

1 spoke to that would have been privy to the outside and what
2 may have occurred outside were not aware of any bus.

3 **MR. HOWARD KRONGOLD:** Last all, I wanted to
4 ask you about a topical summary that's been produced on Don
5 Valley North.

6 I think it's CAN.SUM 1. Sorry, that's not
7 for you, Mr. Lojko.

8 Okay.

9 **MR. HOWARD KRONGOLD:** And while we're calling
10 it up, I'm going to give the standard caveat here. This is a
11 summary of Government of Canada Intelligence Holdings. There
12 is a page of caveats which ought to be considered, and
13 certainly not suggesting that anything stated here is proven
14 fact. But I would like to know what you could tell us, as
15 someone with firsthand knowledge about these subjects.

16 So if we can go down to the second page,
17 please, to point 2.1, it reads:

18 "Intelligence reporting indicated
19 that buses were used to bring
20 international students to the
21 nomination process, in support of Han
22 Dong."

23 Is there anything you can tell us about that?

24 **MR. TED LOJKO:** That may or may not be true,
25 but I was not aware of buses specifically for students or
26 international students.

27 **MR. HOWARD KRONGOLD:** Were you aware of any
28 other means of transporting students or international

1 students to the nomination contest?

2 **MR. TED LOJKO:** So basically every campaign
3 provides transportation to voters to bring them to the voting
4 station, whether it's during an election or during a
5 nomination. If I was aware that there was a cluster of
6 people that needed transportation in larger groups, we would
7 arrange for transportation of that type. I was not aware
8 that there was a cluster of students or young people in any
9 particular area, and so we did not arrange any
10 transportation.

11 There are other buildings that we did arrange
12 transportation, but they were all privately -- private cars
13 and private vans.

14 **MR. HOWARD KRONGOLD:** Okay. The second point
15 here says:

16 "Some Intelligence reporting also
17 indicated that the students were
18 provided with falsified documents to
19 allow them to vote, despite not being
20 residents of DVN."

21 Is there anything you wish to tell us about
22 that statement?

23 **MR. TED LOJKO:** So that makes no sense
24 whatsoever, and I'll tell you why that makes no sense.

25 **MR. HOWARD KRONGOLD:** Please.

26 **MR. TED LOJKO:** First of all, there are only
27 three entities who have access to who is on the membership
28 list: There is Han Dong, the candidate, there is the other

1 candidate, and there is the Liberal Party. For them to be
2 able to provide -- to know who's on that list makes no sense.

3 But then you take it the next step there
4 where they are provided falsified documents. So first of
5 all, who are you providing the falsified documents to, and
6 second of all, anybody that was signed up, signed up by going
7 door to door, would have already been on the list, so it was
8 an assumption that they've already put their address on that
9 membership list and would not have needed to have falsified
10 documents.

11 So the whole thing makes no sense whatsoever,
12 especially when you're talking about a known proxy agent that
13 would somehow have access to a list that is safely guarded by
14 three entities involved with the membership list.

15 **MR. HOWARD KRONGOLD:** And point number three
16 here says:

17 "Intelligence reported after the
18 election indicated that veiled
19 threats were issued by the PRC
20 Consulate to the Chinese
21 international students, implying
22 their student visas would be in
23 jeopardy and that there could be
24 consequences for their families back
25 in the PRC if they did not support
26 Han Dong."

27 Is there anything you can tell us about that
28 statement, sir?

1 **MR. TED LOJKO:** Sure. So first thing is what
2 I've already stated: How would anybody know who was on --
3 who was a member on that list when there's only three
4 entities that have a copy of that membership list, and once
5 the nomination is over, that nomination list ceases to exist.

6 But honestly, and second of all, the student
7 visa aspect; student visas are issued by the Canadian
8 government, not by the Chinese government. So the two --
9 that particular line, to me, makes very little sense.

10 **MR. HOWARD KRONGOLD:** Okay. Thank you very
11 much, sir. Those are my questions.

12 **COMMISSIONER HOGUE:** Thank you. So for the
13 first cross-examination will be conducted by counsel for Han
14 Dong.

15 **MR. MARK POLLEY:** I have no questions.
16 Thank you, Commissioner.

17 **COMMISSIONER HOGUE:** For the Conservative
18 Party?

19 **(SHORT PAUSE/COURTE PAUSE)**

20 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATAIRE PAR**

21 **MR. NANDO de LUCA:**

22 **MR. NANDO de LUCA:** Good afternoon, Mr.
23 Lojko.

24 **MR. TED LOJKO:** Good afternoon.

25 **MR. NANDO de LUCA:** If I understood your
26 evidence correctly -- or maybe I'll ask you; am I correct
27 that in the Liberal Party only members can vote at a
28 nomination meeting?

1 **MR. TED LOJKO:** Yes.

2 **MR. NANDO de LUCA:** Okay. And the objective
3 of a nomination candidate is to get support from existing
4 members and to sign up new members to vote; correct?

5 **MR. TED LOJKO:** Correct.

6 **MR. NANDO de LUCA:** Okay. And do you recall
7 approximately how many members of the Liberal Party there
8 were for Don Valley North at the start of the nomination
9 contest between Mr. Dong and his opponent? I've forgotten
10 the name; sorry.

11 **MR. TED LOJKO:** Honestly, I can't.

12 **MR. NANDO de LUCA:** Okay. And is it fair to
13 say that both Mr. Dong's nomination campaign and his opponent
14 signed up new members?

15 **MR. TED LOJKO:** Absolutely.

16 **MR. NANDO de LUCA:** Okay. But you wouldn't
17 be able -- I take it from the answer you gave me, you
18 wouldn't be able to give us a sense as how many new members
19 were set up or signed between the two campaigns during that
20 period.

21 **MR. TED LOJKO:** It would have been an equal
22 amount of members signed up, but I have no idea how many were
23 actually signed up, in retrospect.

24 **MR. NANDO de LUCA:** Now, when you say an
25 equal amount, you're venturing an assumption as to roughly
26 how many each campaign would have signed up.

27 **MR. TED LOJKO:** Absolutely.

28 **MR. NANDO de LUCA:** Okay. But in terms of an

1 overall number as to how many the total would have
2 represented, in terms of the new signups over who were
3 originally members, you wouldn't be able to help us; correct?

4 **MR. TED LOJKO:** I would assume there was a
5 significant amount more people that were signed up than the
6 old -- than the previous members, yes.

7 **MR. NANDO de LUCA:** So just to make sure, you
8 believe that between the two, Mr. Dong and his opponent,
9 collectively the members that they signed up -- the new
10 members that they signed up collectively were more than what
11 the original membership role would have suggested?

12 **MR. TED LOJKO:** In all probability, yes.

13 **MR. NANDO de LUCA:** Okay. And what do you
14 base that on?

15 **MR. TED LOJKO:** Based -- it's a basic
16 assumption because the list expanded and when we had to enter
17 the membership databases.

18 **MR. NANDO de LUCA:** Okay. And let me ask you
19 about those membership databases. Is that something that --
20 in terms of signing them up or entering those names, is that
21 something that you would have overseen as campaign manager
22 for the new members that you managed to sign up?

23 **MR. TED LOJKO:** Yes. I don't specifically do
24 the data entry but basically I oversee to make sure that it
25 is all done properly, yes.

26 **MR. NANDO de LUCA:** Okay. And would there be
27 a list somewhere, either as part of Mr. Dong's campaign or
28 with the Liberal Party of Canada, that would reflect how many

1 new members were signed up for that nomination contest?

2 **MR. TED LOJKO:** Absolutely. The Liberal
3 Party would have that list, yes.

4 **MR. NANDO de LUCA:** Okay. And would Mr.
5 Dong's campaign have had it at any point in time?

6 **MR. TED LOJKO:** We get the list only once the
7 -- once the -- I was going to say the writ; once the
8 nomination is called. At that point there's -- within 48
9 hours, 72 hours -- I'm not exactly sure -- we get a copy of
10 the final list in order to be able to access all the members
11 to try to solicit their support.

12 **MR. NANDO de LUCA:** Okay. And do you recall
13 if you retained a copy of that list?

14 **MR. TED LOJKO:** We did.

15 **MR. NANDO de LUCA:** Sorry; you did?

16 **MR. TED LOJKO:** Yes, we did.

17 **MR. NANDO de LUCA:** Okay. And were you
18 asked, as part of this process, or did you voluntarily turn
19 over any such list that reflected the membership as a result
20 of that nomination contest?

21 **MR. TED LOJKO:** I don't understand your
22 question.

23 **MR. NANDO de LUCA:** Sorry. The list that you
24 just described, ---

25 **MR. TED LOJKO:** Yeah.

26 **MR. NANDO de LUCA:** --- for me, that you said
27 you kept a copy of at some point, do you still have a copy of
28 it?

1 **MR. TED LOJKO:** No, I do not.

2 **MR. NANDO de LUCA:** Okay.

3 Where did that list go? Who has that?

4 **MR. TED LOJKO:** The party would have the
5 list.

6 **MR. NANDO de LUCA:** Right.

7 **MR. TED LOJKO:** We would have destroyed the
8 list at that point because it was irrelevant for the next
9 stage of the campaign.

10 **MR. NANDO de LUCA:** Okay. And so I take it
11 then that, that was the question I asked, you wouldn't have
12 been in a position to turn over any such list that you had at
13 any point in time to the Commission; correct?

14 **MR. TED LOJKO:** No.

15 **MR. NANDO de LUCA:** Okay. But you do believe
16 that there's a list or a database that reflects all the new
17 names that were signed up by the two campaigns in connection
18 with that 2019 nomination contest; correct?

19 **MR. TED LOJKO:** I believe that the Liberal
20 Party, at that time, had a copy of the list.

21 **MR. NANDO de LUCA:** Right.

22 **MR. TED LOJKO:** Whether that list is still
23 available, I question that it's still available after nine
24 years, quite honestly.

25 **MR. NANDO de LUCA:** Okay. Am I correct that
26 in -- well, I'm going to put it this way. In the
27 Conservative Party, becoming a member requires purchasing a
28 \$15 membership with the member's personal credit card or a

1 cheque from a Canadian ---

2 **MR. TED LOJKO:** Right.

3 **MR. NANDO de LUCA:** --- bank account. And am
4 I correct that in the Liberal Party membership process, that
5 there is no fee to do so?

6 **MR. TED LOJKO:** That changed about eight
7 years ago or something like that. Yes.

8 **MR. NANDO de LUCA:** What do you mean that
9 changed? There is now, or?

10 **MR. TED LOJKO:** There used to be a membership
11 fee, and that membership fee has been waived.

12 **MR. NANDO de LUCA:** Okay. And you think that
13 happened eight years ago?

14 **MR. TED LOJKO:** I'm not exactly sure when
15 that happened, but it was a while back, yes.

16 **MR. NANDO de LUCA:** Okay. But it was before
17 the 2019 election?

18 **MR. TED LOJKO:** Absolutely.

19 **MR. NANDO de LUCA:** And the 2019 nomination
20 contest?

21 **MR. TED LOJKO:** Correct.

22 **MR. NANDO de LUCA:** Okay. And do I
23 understand from that, that today it would be possible to join
24 the Liberal Party of Canada without having a Canadian credit
25 card or a Canadian bank account?

26 **MR. TED LOJKO:** That is correct.

27 **MR. NANDO de LUCA:** Thank you. Those are my
28 questions.

1 **COMMISSIONER HOGUE:** Thank you.

2 Counsel for Michael Chan?

3 **MR. GIB van ERT:** No questions for this
4 witness, Commissioner.

5 **COMMISSIONER HOGUE:** Human Rights Coalition?

6 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

7 **MS. SARAH TEICH:**

8 **MS. SARAH TEICH:** Good afternoon. If we can
9 pull up a witness statement, WIT 21? I have a clarifying
10 question on paragraph 42. I'll just wait for that to load.
11 Thank you.

12 **--- EXHIBIT No./PIÈCE No. 21 EN:**

13 Interview Summary: Ted Lojko

14 **--- EXHIBIT No./PIÈCE No. 21 EN:**

15 Résumé d'entrevue : Ted Lojko

16 Mr. Lojko, you shared that there are no
17 background checks on volunteers. And I'll read directly from
18 this:

19 "Generally, if there is a suspicious
20 individual – for instance someone who
21 wants access to a database – the
22 campaign will 'move them out the
23 door'."

24 Is there anything else that would flag an
25 individual as suspicious?

26 **MR. TED LOJKO:** There are many things that
27 would -- that the campaign has to look at. If people are
28 being harassed in the campaign, if there are people in there

1 that are soliciting for -- soliciting their point of view,
2 they are also looked at very suspiciously as well. And,
3 quite honestly, we try to make sure that everybody feels
4 comfortable volunteering in a campaign without being
5 intimidated by other people. If somebody is asking to access
6 the database, the database is only used by X amount of people
7 and we do not allow anybody access to the computer.

8 **MS. SARAH TEICH:** Thank you. When you say
9 harassed, do you mean within the campaign office? Or would
10 that include, for example, volunteers harassing voters or
11 potential voters to vote for Mr. Dong?

12 **MR. TED LOJKO:** Harassed within volunteers.
13 So if somebody is harassing a young woman or anything, or a
14 young male for that matter, we -- as the Campaign Manager, it
15 comes to my attention, and normally I have to deal with that
16 particular individual. If that persists, then basically
17 sometimes we have to ask them to leave. Yes.

18 **MS. SARAH TEICH:** All right. Thank you.
19 Can we pull up the topical summary again?
20 Thank you. And I'd like to go back to that point about
21 intelligence reported that veiled threats were issued. If we
22 could go back to that? Yes, point three. Thank you.

23 Mr. Lojko, you shared that this makes no
24 sense for two reasons, essentially that only three entities
25 have access to the list and that student visas are issued by
26 the Canadian Government, not the Chinese Government.

27 **MR. TED LOJKO:** Sure.

28 **MS. SARAH TEICH:** Did I get that right?

1 **MR. TED LOJKO:** Yeah.

2 **MS. SARAH TEICH:** Beyond access to the list,
3 volunteers go door knocking; right?

4 **MR. TED LOJKO:** Yes.

5 **MS. SARAH TEICH:** So isn't it possible that a
6 volunteer goes door knocking and coerces a Chinese
7 international student that way?

8 **MR. TED LOJKO:** I don't understand the
9 question, sorry.

10 **MS. SARAH TEICH:** Well a volunteer doesn't
11 necessarily need access to the list to coerce a potential
12 voter if volunteers are engaged in door knocking. Isn't that
13 right?

14 **MR. TED LOJKO:** So normally when volunteers
15 go door knocking, they go with a candidate or his wife, kind
16 of thing; right? Because the potential members are going to
17 be voting for that particular individual. We just don't send
18 out squads of people just knocking on arbitrary doors. So we
19 do not intimidate people at the door, especially when you
20 have the candidate and people that really should know what
21 they're doing at the door. So no, we do not intimidate
22 people to become members, because it serves no purpose.

23 **MS. SARAH TEICH:** All right. So by
24 extension, if coercion happened with door knocking, Mr. Dong
25 would know about it? Is that right?

26 **MR. TED LOJKO:** Correct.

27 **MS. SARAH TEICH:** And is there also -- do you
28 also have volunteers engaged in phone calls?

1 **MR. TED LOJKO:** I'm sorry?

2 **MS. SARAH TEICH:** Do you also have volunteers
3 engaged in phone calls?

4 **MR. TED LOJKO:** Yes.

5 **MS. SARAH TEICH:** Is it possible that
6 volunteers could engage in coercion via phone calls?

7 **MR. TED LOJKO:** That may occur. Some of our
8 volunteers, especially our seniors, are very animated in some
9 of their calling. I have no idea what some of the -- what
10 some of the conversations are because I do not speak either
11 Mandarin, or Iranian, or Armenian, and some of them -- some
12 of the older types tend to be on the phones longer than they
13 need to.

14 **MS. SARAH TEICH:** The point about you said
15 student visas are issued by the Canadian Government, not the
16 Chinese Government, wouldn't you agree that there are other
17 ways that students can be threatened by the Chinese
18 Government if they don't vote a certain way?

19 **MR. TED LOJKO:** That is possible, but my
20 comment was in relation to if there were members, how would
21 they have access to the list in the first place?

22 **MS. SARAH TEICH:** Right. But ---

23 **MR. TED LOJKO:** And then -- and how -- and
24 therefore, you know, if they were on the list, how would you
25 basically try to intimidate them if you didn't even know that
26 they were on the list?

27 **MS. SARAH TEICH:** That's right. But we have
28 established just now that volunteers have access to voters or

1 potential voters by door knocking, albeit with Mr. Dong,
2 and/or phone calls; right?

3 **MR. TED LOJKO:** No. I didn't say that.
4 Basically during an election period, we have a list of
5 eligible voters. During the nomination process, we basically
6 do not have a list of potential voters or residents.

7 **MS. SARAH TEICH:** Okay. Volunteers still
8 engage in door knocking and phone calls during nomination ---

9 **MR. TED LOJKO:** Correct.

10 **MS. SARAH TEICH:** --- contests. Isn't that
11 right?

12 All right. No further questions. Thank you.

13 **COMMISSIONER HOGUE:** Thank you.

14 Government of Canada, any questions?

15 **MS. LAURA DOUGAN:** None for this witness.

16 Thank you.

17 **COMMISSIONER HOGUE:** And any re-examination?

18 **MR. HOWARD KRONGOLD:** No, thank you.

19 **COMMISSIONER HOGUE:** So we are ahead of our
20 time by three minutes. We'll take a short recess just
21 because there's another witness. Ah no -- yes. Yes, yes,
22 yes.

23 **MR. HOWARD KRONGOLD:** We may be able to
24 continue. I see the next witness, Michael Chan, is in the
25 hearing room.

26 **COMMISSIONER HOGUE:** Is he? Okay. Perfect.

27 **MR. HOWARD KRONGOLD:** Certainly in your
28 hands.

1 **COMMISSIONER HOGUE:** No need for a recess.
2 Perfect.

3 **MR. TED LOJKO:** Thank you.

4 **COMMISSIONER HOGUE:** Thank you, sir.

5 **MR. HOWARD KRONGOLD:** Madam Commissioner, I
6 just wanted to indicate as well -- it's okay, please go
7 ahead, Mr. Chan -- that my colleague is going to be sitting
8 up with Mr. Chan to assist him in viewing any documents that
9 he needs to.

10 Can we bring up document WIT-17?

11 **COMMISSIONER HOGUE:** just a moment. He has
12 to be sworn in.

13 **MR. HOWARD KRONGOLD:** Oh, sorry. I knew I
14 missed something.

15 **THE REGISTRAR:** Good evening, Mr. Chan.
16 Could you please state your name, your full name, and spell
17 your last name for the record?

18 **MR. MICHAEL CHAN:** My name is Michael Chan,
19 also known as K-W-O-K C-H-I. C-H-A-N is my last name.

20 **--- MR. MICHAEL CHAN, Affirmed/Sous affirmation solennelle:**

21 **THE REGISTRAR:** Thank you very much.
22 Counsel, you may proceed.

23 **--- EXAMINATION IN-CHIEF BY/INTERROGATOIRE EN-CHEF PAR**

24 **MR. HOWARD KRONGOLD:**

25 **MR. HOWARD KRONGOLD:** Thank you. If we could
26 bring up WIT 17?

27 **--- EXHIBIT No./PIÈCE No. WIT 17.EN:**

28 Interview Summary: Michael Chan

1 --- EXHIBIT No./PIÈCE No. WIT 17.FR:

2 Résumé d'entrevue : Michael Chan

3 **MR. HOWARD KRONGOLD:** Mr. Chan, in the
4 meantime, do you recall being interviewed by Commission
5 counsel on February 20th of this year?

6 **MR. MICHAEL CHAN:** Yes.

7 **MR. HOWARD KRONGOLD:** Okay. And the document
8 before you is an interview summary that was generated from
9 that discussion?

10 **MR. MICHAEL CHAN:** Yes.

11 **MR. HOWARD KRONGOLD:** Right. And have you
12 had a chance to review it for accuracy?

13 **MR. MICHAEL CHAN:** I did.

14 **MR. HOWARD KRONGOLD:** And is it accurate to
15 the best of your knowledge, information, and belief?

16 **MR. MICHAEL CHAN:** Yes.

17 **MR. HOWARD KRONGOLD:** Do you have any
18 corrections, additions, or deletions you'd like to make?

19 **MR. MICHAEL CHAN:** No.

20 **MR. HOWARD KRONGOLD:** And do you adopt it as
21 part of your evidence before the Commission?

22 **MR. MICHAEL CHAN:** Yes.

23 **MR. HOWARD KRONGOLD:** Wonderful. Just to
24 briefly discuss your background, Mr. Chan, you immigrated to
25 Canada in 1969, I understand?

26 **MR. MICHAEL CHAN:** Yes.

27 **MR. HOWARD KRONGOLD:** All right. Your
28 professional background is in the insurance industry? Is

1 that right?

2 **MR. MICHAEL CHAN:** Yes. I stopped in 1975.

3 **MR. HOWARD KRONGOLD:** Okay. And I understand
4 you got involved in Liberal Party politics in about 1984?

5 **MR. MICHAEL CHAN:** Yes, about that time.

6 **MR. HOWARD KRONGOLD:** And you've been
7 involved in campaigns for, I take it, it'd be dozens of
8 Liberal politicians at both the federal and provincial levels
9 in Ontario?

10 **MR. MICHAEL CHAN:** Yes, many.

11 **MR. HOWARD KRONGOLD:** You served as an
12 Ontario MPP from 2007 to 2018?

13 **MR. MICHAEL CHAN:** That's right.

14 **MR. HOWARD KRONGOLD:** And you were in Cabinet
15 with several different Ministerial portfolios essentially
16 throughout your time at Queen's Park?

17 **MR. MICHAEL CHAN:** Yes, I was a Minister for
18 11 years.

19 **MR. HOWARD KRONGOLD:** You retired from
20 provincial politics in June 2018?

21 **MR. MICHAEL CHAN:** That's right.

22 **MR. HOWARD KRONGOLD:** And that was --
23 coincided with the 2018 Ontario General Election, as I
24 understand it?

25 **MR. MICHAEL CHAN:** That's right, because
26 before election, I declared I'm not running. So retired.

27 **MR. HOWARD KRONGOLD:** And I understand you
28 moved over to municipal politics in October of '22?

1 **MR. MICHAEL CHAN:** That's right.

2 **MR. HOWARD KRONGOLD:** And you are currently
3 the Deputy Mayor of the City of Markham?

4 **MR. MICHAEL CHAN:** That is right.

5 **MR. HOWARD KRONGOLD:** I want to ask you a
6 little bit about your relationship with Han Dong.

7 **MR. MICHAEL CHAN:** Okay.

8 **MR. HOWARD KRONGOLD:** Do you recall when or
9 in what circumstances you first met him?

10 **MR. MICHAEL CHAN:** Many years ago.

11 **MR. HOWARD KRONGOLD:** Okay.

12 **MR. MICHAEL CHAN:** I understand he worked for
13 the government or the Liberal Party. And, yeah, many years.
14 And, you know, I know his wife, you know, Sophie, as well.

15 **MR. HOWARD KRONGOLD:** You know his wife,
16 Sophie, ---

17 **MR. MICHAEL CHAN:** M'hm.

18 **MR. HOWARD KRONGOLD:** --- as well?

19 **MR. MICHAEL CHAN:** Yeah. M'hm.

20 **MR. HOWARD KRONGOLD:** Okay. And did you know
21 Mr. Dong before he was elected as an MPP in 2014?

22 **MR. MICHAEL CHAN:** Yes. I -- because in
23 government, we run into people. So I might have kind of,
24 like, ran into him. And yeah, I would say I knew him before
25 that.

26 **MR. HOWARD KRONGOLD:** Okay. And he was -- I
27 gather at that time he was a political staffer and you were
28 an MPP?

1 **MR. MICHAEL CHAN:** That's right. M'hm.

2 **MR. HOWARD KRONGOLD:** Okay. Did your
3 relationship with him continue after he became an MPP in
4 2014?

5 **MR. MICHAEL CHAN:** Of course. You know, he's
6 an MPP. I'm also an MPP, by the way. And we see in the
7 House. Not together, but you know, we kind of run into each
8 other. I mean, frequently, I would say.

9 **MR. HOWARD KRONGOLD:** I'm sorry?

10 **MR. MICHAEL CHAN:** We run into each other, I
11 mean, you know, many times.

12 **MR. HOWARD KRONGOLD:** Okay. You ran into
13 each other many times. Yeah.

14 **MR. MICHAEL CHAN:** M'hm.

15 **MR. HOWARD KRONGOLD:** And what was the nature
16 of your relationship, let's say going up to the period when
17 you both left office in 2018?

18 **MR. MICHAEL CHAN:** I would say, like, a
19 business colleague, you know, political colleague, and you
20 know, you say hello when you see each other and sometimes you
21 -- we met. You know, we met in festivals, and events, and
22 people inviting us to go there and, you know, I may make a
23 remark, he may make a remark. So those are the I would say
24 very standard routine encounters.

25 **MR. HOWARD KRONGOLD:** Okay. And I understand
26 you both left provincial politics in June 2018.

27 **MR. MICHAEL CHAN:** M'hm.

28 **MR. HOWARD KRONGOLD:** Ultimately, Mr. Dong

1 decides to run for the federal Liberal nomination in Don
2 Valley North.

3 **MR. MICHAEL CHAN:** Yes.

4 **MR. HOWARD KRONGOLD:** Did you play any role
5 in encouraging Mr. Dong to run for the Liberals in Don Valley
6 North?

7 **MR. MICHAEL CHAN:** I was the one who called
8 him and I think one day, it's a sunny -- I think it's a sunny
9 day, and it's warm, so it's in the summer time, and I heard
10 from the radio that the previous MP, Geng Tan, is not
11 running. It was on the radio. So I picked up the phone and
12 called Han Dong, "Look, Han, you know, Geng Tan said he's not
13 running. You should consider." And I remember he said --
14 his response was, "Oh, I'm --" you know he was on a fishing
15 trip.

16 **MR. HOWARD KRONGOLD:** He was on a fishing
17 trip. Yeah.

18 **MR. MICHAEL CHAN:** Yeah.

19 **MR. HOWARD KRONGOLD:** Okay. And why did you
20 encourage him to run?

21 **MR. MICHAEL CHAN:** Oh, again, I know him and
22 I think he's an experienced politician. You know, he worked
23 in the Provincial Government. And one thing I think he
24 should be good, his language, the communication, because he
25 speaks fluent English, his Mandarin is very good, and also,
26 his Cantonese is also very good. So I think that he would be
27 a good person to be in the political arena.

28 **MR. HOWARD KRONGOLD:** Okay. Did you have any

1 involvement in Han Dong's nomination campaign in 2019?

2 **MR. MICHAEL CHAN:** I would say no because I
3 was busy, I was travelling very heavily out of the country,
4 and in terms of nomination, no. Perhaps I may have attended,
5 so for a curtesy, a press conference that he's running or
6 something like that. But in terms of actual, like,
7 involvement, no.

8 **MR. HOWARD KRONGOLD:** Do you recall if you
9 were present for his nomination announcement?

10 **MR. MICHAEL CHAN:** I -- present? Can you
11 repeat your question please?

12 **MR. HOWARD KRONGOLD:** Do you recall if you
13 were present when he announced that he was running for the
14 nomination?

15 **MR. MICHAEL CHAN:** I can't recall. I can't.
16 I'm sorry.

17 **MR. HOWARD KRONGOLD:** Okay. Have you
18 attended a lot of nomination announcements?

19 **MR. MICHAEL CHAN:** In my ---

20 **MR. HOWARD KRONGOLD:** In your life.

21 **MR. MICHAEL CHAN:** --- political career?

22 **MR. HOWARD KRONGOLD:** Yeah.

23 **MR. MICHAEL CHAN:** Oh, yes. Of course.

24 **MR. HOWARD KRONGOLD:** Okay.

25 **MR. MICHAEL CHAN:** Yes.

26 **MR. HOWARD KRONGOLD:** Did you do anything
27 else to support his campaign?

28 **MR. MICHAEL CHAN:** I think I attended his

1 campaign office opening. That would be at the election time.
2 And I may have knocked on doors for him maybe one or maximum
3 two times. And basically, I did it -- I was busy, by the
4 way, so I -- it's probably a curtesy, kind of, like,
5 supporting him. Something like that.

6 **MR. HOWARD KRONGOLD:** Do you recall if you
7 were at the nomination contest meeting where he was ---

8 **MR. MICHAEL CHAN:** I cannot recall, but I
9 would be inclined to tell you I wasn't there.

10 **MR. HOWARD KRONGOLD:** Do you have any first-
11 hand knowledge about any irregularities in the nomination
12 contest?

13 **MR. MICHAEL CHAN:** Definitely no.

14 **MR. HOWARD KRONGOLD:** Okay. We've heard some
15 evidence this morning from Mr. Dong about Chinese
16 international students who were living at Seneca College who
17 appear to have been bused to the 2019 DVN Nomination Contest.

18 At the time in 2019, I understand you were a
19 Governor of Seneca College?

20 **MR. MICHAEL CHAN:** Yes.

21 **MR. HOWARD KRONGOLD:** Okay. Did you know
22 anything about the bussing of Chinese international students
23 to Han Dong's nomination vote?

24 **MR. MICHAEL CHAN:** Definitely no.

25 **MR. HOWARD KRONGOLD:** Okay. You mentioned
26 that at the time the nomination was going on, you were
27 working overseas?

28 **MR. MICHAEL CHAN:** Yeah, I was travelling

1 overseas.

2 **MR. HOWARD KRONGOLD:** Travelling overseas.

3 **MR. MICHAEL CHAN:** I'm not working there.

4 Yeah.

5 **MR. HOWARD KRONGOLD:** No, fair enough. Okay.

6 And what is it you were doing overseas?

7 **MR. MICHAEL CHAN:** I tried to set up a
8 certification center for -- in the Country of Cambodia. And
9 allow me to explain. The certification center is goods that
10 is going out of the country or coming into the country, they
11 need to be certified so that, you know, that can be used for
12 within that country. And in the moment -- at that moment,
13 there is no certification center in Cambodia. And what the
14 country did is, all the goods they produce, they have sent to
15 perhaps Thailand, or Vietnam, and you know, through those
16 countries, that would be certified, and then go to other
17 countries. So it makes sense. And it makes very good
18 business sense if I can set it up.

19 **MR. HOWARD KRONGOLD:** Okay. And when was it
20 that you were working on this business opportunity?

21 **MR. MICHAEL CHAN:** I travelled there many
22 times, 2019. I would say that idea came out in late 2018 and
23 then, you know, we started working on it. That's why I
24 travelled so often, so many times, there.

25 **MR. HOWARD KRONGOLD:** The 43rd General
26 Election was October 21st, 2019. Do I have that day right?
27 Was -- were you still working on this business through to
28 election day?

1 **MR. MICHAEL CHAN:** Yes.

2 **MR. HOWARD KRONGOLD:** Okay. And how much
3 time were you spending travelling in that period?

4 **MR. MICHAEL CHAN:** I -- well, I tried to get
5 the documents so that I could show you. I travelled from
6 late 2018 to October or November 2019. I travelled there
7 eight or nine times.

8 **MR. HOWARD KRONGOLD:** And then ---

9 **MR. MICHAEL CHAN:** And long-distance
10 travelling, by the way.

11 **MR. HOWARD KRONGOLD:** I'm sorry?

12 **MR. MICHAEL CHAN:** It's long-distance
13 travelling.

14 **MR. HOWARD KRONGOLD:** It is long distance.
15 Yes. In this period of time from late 2018 to late 2019, did
16 you have any contact with officials from PRC?

17 **MR. MICHAEL CHAN:** Oh, yes. M'hm.

18 **MR. HOWARD KRONGOLD:** Okay. And what was the
19 purpose of that contact?

20 **MR. MICHAEL CHAN:** You see, the certification
21 center is a business for the local Cambodian people, and also
22 the technology is from China, meaning there is some Chinese
23 investment in this project. So I -- because it's -- I think
24 this is a very significant project. So I think that it's
25 important to pay a visit to the Chinese Ambassador in
26 Cambodia. And his name is Wang, Wang Wentian.

27 **MR. HOWARD KRONGOLD:** I'm sorry, how do we
28 spell his last name? W-A-?

1 **MR. MICHAEL CHAN:** W-A-N-G.

2 **MR. HOWARD KRONGOLD:** Okay.

3 **MR. MICHAEL CHAN:** And then somehow I
4 discovered that Mr. Wang, he used to work in Ottawa. Right
5 here in the Embassy. And so then I was kind of able to get
6 to another person, he's the Deputy Consul General. His name
7 is Mr. Zhuang. Z-H-U-A-N-G. Something like that. And at
8 that time, he was the Deputy Consul General working in
9 Toronto. So I kind of, like, you know, contacted him and
10 asked him, you know, "Look, can you be kind enough to kind
11 of, like, make a reference so that I can go to Cambodia and
12 have a meeting with Ambassador Wang?"

13 **MR. HOWARD KRONGOLD:** Okay. And just to have
14 the spellings here, I understand the PRC Ambassador to
15 Cambodia is first name W-E-N ---

16 **MR. MICHAEL CHAN:** W-A-N-G. Wang.

17 **MR. HOWARD KRONGOLD:** Oh, I'm sorry. Okay.
18 And then his other names, I have one, W-E-N and then T-I-A-N?
19 Is that correct?

20 **MR. MICHAEL CHAN:** Yeah, I don't know.

21 **MR. HOWARD KRONGOLD:** You're not sure.

22 **MR. MICHAEL CHAN:** If there's a mistake, I
23 can follow up and give you the right name. I'm sorry.

24 **MR. HOWARD KRONGOLD:** All right. That's
25 fine.

26 So you -- so as I understand what you're
27 saying, you -- the PRC Ambassador to Cambodia, Mr. Wong, used
28 to work in ---

1 **MR. MICHAEL CHAN:** Ottawa.

2 **MR. HOWARD KRONGOLD:** And you reached out to
3 the PRC Deputy Consul General, Mr. Zhuang, ---

4 **MR. MICHAEL CHAN:** M'hm.

5 **MR. HOWARD KRONGOLD:** --- to help you arrange
6 a meeting with Mr. Wang?

7 **MR. MICHAEL CHAN:** That is true.

8 **MR. HOWARD KRONGOLD:** Okay. Why would you
9 need to involve the PRC Ambassador to Cambodia to help you
10 with a business in Cambodia?

11 **MR. MICHAEL CHAN:** It's quite customary, you
12 know, when you're doing business. I was the International
13 Trade Minister before for Ontario and it's quite common that
14 we kind of, like, get assistance of Diplomats or Consuls to
15 promote the business, to promote one particular business.
16 It's very common.

17 **MR. HOWARD KRONGOLD:** I understand that you
18 did ultimately, as I understand it, meet with Mr. Zhuang?

19 **MR. MICHAEL CHAN:** Yes.

20 **MR. HOWARD KRONGOLD:** In Canada?

21 **MR. MICHAEL CHAN:** Yeah, here.

22 **MR. HOWARD KRONGOLD:** And that meeting
23 happened in Canada?

24 **MR. MICHAEL CHAN:** Yes.

25 **MR. HOWARD KRONGOLD:** In the GTA?

26 **MR. MICHAEL CHAN:** In the GTA. Yes.

27 **MR. HOWARD KRONGOLD:** Was anybody else
28 present for that meeting?

1 **MR. MICHAEL CHAN:** Mr. Zhao Wei.

2 **MR. HOWARD KRONGOLD:** Zhao Wei?

3 **MR. MICHAEL CHAN:** M'hm.

4 **MR. HOWARD KRONGOLD:** Do you know why Zhao
5 Wei was there?

6 **MR. MICHAEL CHAN:** I don't have an idea.
7 Usually, you know, I -- in 2019 on, I was a private citizen.
8 So I went there alone. But then when I was a Minister for
9 the Provincial Government, when I meet foreign diplomats, I
10 usually brought my assistants. Meaning that I don't meet
11 them alone. I meet them, you know, with assistants. But
12 regardless who am I meeting, or regardless which country's
13 diplomat I'm meeting. But for this particular one, I went
14 alone, but then I met both Mr. Zhuang and Mr. Zhao Wei.

15 **MR. HOWARD KRONGOLD:** Did you know that Zhao
16 Wei would be there?

17 **MR. MICHAEL CHAN:** No.

18 **MR. HOWARD KRONGOLD:** Had you met him before?

19 **MR. MICHAEL CHAN:** I -- did I meet him
20 before? Yeah, I may run into him. You know, I -- during my
21 time in the Provincial Government, on record I went to 7,000
22 events. So I met a lot of people. I met a lot of diplomats
23 of many, many countries. Of course, those from China, I meet
24 them more often because the background of myself and also the
25 businesses I'm bringing in.

26 **MR. HOWARD KRONGOLD:** Okay. Do you have --
27 do you know why Zhao Wei was there, specifically?

28 **MR. MICHAEL CHAN:** No, I -- you know, he was

1 there, but, you know, and I don't -- I can't give you an
2 answer because I don't know.

3 **MR. HOWARD KRONGOLD:** Do you remember when
4 that meeting with Mr. Zhuang and Zhao Wei occurred?

5 **MR. MICHAEL CHAN:** It's cold, so it has to be
6 in the wintertime. Perhaps January, or February, or March.
7 But I think it's around that time.

8 **MR. HOWARD KRONGOLD:** Okay. When you -- did
9 you have any other meetings where Zhao Wei was present in
10 this period of time? So late 20 ---

11 **MR. MICHAEL CHAN:** After that? After that
12 meeting?

13 **MR. HOWARD KRONGOLD:** Yes. Sure.

14 **MR. MICHAEL CHAN:** Okay.

15 **MR. HOWARD KRONGOLD:** Or sorry, I don't -- I
16 just want to focus you on the period from late 2018 to late
17 2019. You've told us about one meeting where Zhao Wei was
18 present. Any other meetings where he was present in that
19 period?

20 **MR. MICHAEL CHAN:** No. Not that I can
21 recall. No.

22 **MR. HOWARD KRONGOLD:** All right. When you
23 met Zhao Wei and Mr. Zhuang on this occasion about, I gather,
24 your Cambodia business, did you discuss with him or with them
25 anything related to Han Dong?

26 **MR. MICHAEL CHAN:** No. No. Definitely, no.

27 **MR. HOWARD KRONGOLD:** Did you discuss
28 anything at all related to the nomination race in Don Valley

1 North?

2 MR. MICHAEL CHAN: No.

3 MR. HOWARD KRONGOLD: Anything related to
4 Canadian elections?

5 MR. MICHAEL CHAN: No.

6 MR. HOWARD KRONGOLD: Did you meet with other
7 PRC Consular officials in addition to the people we've spoken
8 about?

9 MR. MICHAEL CHAN: Twenty-nineteen (2019)?
10 In and out, in and out, in and out. I -- if I -- I -- no. I
11 don't think so, because I worked and I spent so much time in
12 foreign countries, I come back here -- no. The answer is no.

13 MR. HOWARD KRONGOLD: Okay. Can I just get
14 one point of clarification? In your witness summary, and it
15 is WIT 17, it's right at the last paragraph, that's it,
16 there's a reference here to an Ambassador LI, L-I, who is
17 identified as the Chinese Ambassador to Cambodia?

18 MR. MICHAEL CHAN: The spelling is wrong. It
19 should be Wang. W-A-N-G.

20 MR. HOWARD KRONGOLD: Okay. So it's not
21 Ambassador Li, L-I?

22 MR. MICHAEL CHAN: No, it is wrong.

23 MR. HOWARD KRONGOLD: Okay, that's an error.
24 Yes? It was an error?

25 MR. MICHAEL CHAN: Oh yeah, that's an error.

26 MR. HOWARD KRONGOLD: Okay. Thank you very
27 much, those are my questions, sir.

28 MR. MICHAEL CHAN: Thank you.

1 **COMMISSIONER HOGUE:** Thank you.
2 Cross-examination. First one is counsel for
3 Han Dong.

4 **MR. MARK POLLEY:** No questions. Thank you.

5 **COMMISSIONER HOGUE:** No questions.
6 Counsel for Michael Chong.

7 **(SHORT PAUSE/COURTE PAUSE)**

8 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

9 **MR. GIB van ERT:**

10 **MR. GIB van ERT:** Sir, how many times have
11 you met Zhao Wei?

12 **MR. MICHAEL CHAN:** How many times? I run
13 into him in public once -- four or five times over the years.

14 **MR. GIB van ERT:** Four or five times in
15 your...?

16 **MR. MICHAEL CHAN:** Over perhaps two or three
17 years.

18 **MR. GIB van ERT:** In your entire life, four
19 or five times?

20 **MR. MICHAEL CHAN:** Yeah, yeah, yeah.
21 Because I went to so many events and, you know, it can be 300
22 people in there, it can be 800 people in there, and he may be
23 there. You know, I met him in -- I met him in public place.

24 **MR. GIB van ERT:** Thank you.

25 I'll ask the Court Operator to turn up COM
26 67, please.

27 **--- EXHIBIT No./PIÈCE No. COM 67:**

28 Article: CSIS warned Trudeau about

1 Toronto-area politician's alleged
2 ties to Chinese diplomats [The Globe
3 and Mail]

4 **MR. GIB van ERT:** I'm showing you a report
5 from the *Globe and Mail*.

6 **MR. MICHAEL CHAN:** Okay.

7 **MR. GIB van ERT:** Oh, I may have the number
8 wrong; sorry.

9 (SHORT PAUSE/COURTE PAUSE)

10 **MR. GIB van ERT:** I'm going to try to do it
11 without the document. Sir, do you recall in February 2023
12 the *Globe and Mail* -- ah, here it is. I understand you have
13 some vision issues so I'm going to try to help you without
14 the document but it's there now if we need it.

15 **MR. MICHAEL CHAN:** Thank you.

16 **MR. GIB van ERT:** Do you recall the *Globe and*
17 *Mail* reporting that there had been a CSIS brief alleging that
18 you had had meetings that were clandestine in nature and
19 election related with Mr. Zhao Wei? Do you recall that
20 report?

21 **MR. MICHAEL CHAN:** Can someone get the
22 document I can see exactly ---

23 **MR. GIB van ERT:** Yeah, let's try to get it
24 for you.

25 **MR. MICHAEL CHAN:** Yes. It's moving now.

26 **MR. GIB van ERT:** It's moving now, that's
27 right. And at the bottom of page 2, it's the paragraph that
28 begins -- oh, slow down. Ah, there we are. It's the

1 paragraph that begins -- the last paragraph on that page, it
2 begins, "In 2019." I'll read it for you, sir:

3 "In 2019, Mr. Chan had a number of
4 meetings with Mr. Zhao that were
5 described in a CSIS 2020 briefing
6 package as 'clandestine in nature'
7 and were allegedly election related,
8 the source said."

9 My question for you, sir, is do you deny the
10 truth of that statement?

11 **MR. MICHAEL CHAN:** Definitely.

12 **MR. GIB van ERT:** Thank you.

13 Sir, the David Johnston report says this --
14 and I can take you to it if you need to but it's a very short
15 quote.

16 **MR. MICHAEL CHAN:** Okay.

17 **MR. GIB van ERT:** So perhaps I'll just try
18 reading it to you.

19 Mr. Johnston, at page 29 of the report, in
20 case anyone wants to make a note, said this:

21 "Attempts at foreign interference are
22 ubiquitous, especially from the PRC.
23 Successive federal governments have
24 known about it for years." (As read)

25 My question for you is; do you accept the
26 People's Republic of China has attempted to interfere in
27 Canadian elections?

28 **MR. MICHAEL CHAN:** Over the years I have read

1 many, many report similar to the one you just showed me. In
2 term of, like, do I accept foreign interference? Well, if
3 any country, whether it's China or India or Iran or Singapore
4 or Korea or Japan, that interfere with Canadian election, I
5 condemn it; it's not good.

6 **MR. GIB van ERT:** Yes. Let me ask my
7 question again because I want to rephrase it for you.

8 Mr. Johnston seems to be saying here that the
9 People's Republic of China is doing it, and my question for
10 you -- I understand you have condemned it. My question for
11 you is, do you agree with Mr. Johnston, or do you accept his
12 conclusion that PRC is engaged in such interference, or do
13 you say that you don't believe that's true?

14 **MR. MICHAEL CHAN:** I -- Mr. Johnston is a
15 very respected person. I respect him. Actually, I met him.
16 I met him before, and he's really a nice person. And look;
17 he has all those information delegated by the government for
18 him to address, and I mean, I -- I mean, some of those
19 information document, I have not read it. So I think Mr.
20 Johnston is entitled to his finding. But then now you're
21 asking me a question that I don't have information in front
22 of me. I don't have those information, so I cannot really
23 give you an answer to it.

24 **MR. GIB van ERT:** All right. Does it trouble
25 you, sir, that Mr. Johnston, having the information that he
26 does, more than you have, more than I have, ---

27 **MR. MICHAEL CHAN:** No, no.

28 **MR. GIB van ERT:** --- that he ---

1 **MR. MICHAEL CHAN:** He had a job to do, yeah.
2 I mean, he was delegated to look into the matter.

3 **MR. GIB van ERT:** Yes. And just one final
4 question is -- you're absolutely right, he was tasked with
5 that job.

6 **MR. MICHAEL CHAN:** M'hm.

7 **MR. GIB van ERT:** He was given access to
8 information that you and I don't have, and he concluded that
9 the PRC is engaging in foreign interference in this country.
10 And my question for you is, does that concern you; does that
11 worry you? A lot of other Canadians are worried, and I want
12 to know if you are too.

13 **MR. MICHAEL CHAN:** Of course.

14 **MR. GIB van ERT:** Thank you. Thank you,
15 that's very helpful.

16 **COMMISSIONER HOGUE:** Thank you.
17 Conservative Party?

18 **(SHORT PAUSE/COURTE PAUSE)**

19 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

20 **MR. NANDO de LUCA:**

21 **MR. NANDO de LUCA:** Good afternoon, Mr. Chan.

22 **MR. MICHAEL CHAN:** Good afternoon, sir.

23 **MR. NANDO de LUCA:** I just want to see if I
24 can summarize what you indicated earlier, because I just want
25 to make sure I have these points out in your evidence.

26 You indicated, I believe, that you were often
27 out of the country in 2018 and 2019; is that correct?

28 **MR. MICHAEL CHAN:** Yes.

1 **MR. NANDO de LUCA:** Okay. And you were
2 attempting, if I understood correctly, to set up a business
3 to certify goods going in and out of Cambodia?

4 **MR. MICHAEL CHAN:** That is true.

5 **MR. NANDO de LUCA:** Okay. And did you
6 establish that business?

7 **MR. MICHAEL CHAN:** Me?

8 **MR. NANDO de LUCA:** Yes.

9 **MR. MICHAEL CHAN:** Establish? No, it's in
10 partnership, you know, with local Cambodian, myself, and also
11 a business people -- business person in China.

12 **MR. NANDO de LUCA:** Okay. So you had an
13 interest, some sort of a financial interest in that business?

14 **MR. MICHAEL CHAN:** It's not set up yet
15 because of COVID-19. Will be set up; I would love to have
16 some interest.

17 **MR. NANDO de LUCA:** Okay. So you didn't --
18 you were overseas trying to set it up in 2018 and '19 but as
19 of today it's not up and running?

20 **MR. MICHAEL CHAN:** No, because it's almost
21 done ---

22 **MR. NANDO de LUCA:** Right.

23 **MR. MICHAEL CHAN:** --- and then COVID hit.
24 And then everything stop.

25 **MR. NANDO de LUCA:** Right.

26 **MR. MICHAEL CHAN:** And then you probably
27 aware, China took longer time to address COVID-19 and the
28 country was kind of at lockup, and so -- and then the whole

1 thing kind of like pending. And I may even go next month to
2 try to finalize it, if I can.

3 **MR. NANDO de LUCA:** Yeah, but COVID's over
4 here, and it was over in China even a year ago. No?

5 **MR. MICHAEL CHAN:** I think they kind of like
6 -- we opened up maybe a year earlier than China.

7 **MR. NANDO de LUCA:** Okay. And does this
8 business, even though it hasn't started, does it have a name?

9 **MR. MICHAEL CHAN:** Not yet. Okay? We tried
10 to get a name called CXE (phonetic), but then, no, not done
11 yet. We still have to get there to finalize it.

12 **MR. NANDO de LUCA:** Okay. I just want to put
13 a button on the names of the individuals because we heard a
14 few names that assisted you or that you sought to elicit the
15 assistance of in 2018 and '19. Can I get your interview
16 summary put up again in paragraph 32?

17 Maybe you can have a look at that again.

18 **MR. MICHAEL CHAN:** Yeah.

19 **MR. NANDO de LUCA:** So -- and I'll ask you
20 these questions.

21 Whose assistance were you ultimately looking
22 for; was it the Ambassador's or the Deputy Consul General's?

23 **MR. MICHAEL CHAN:** Oh, the Ambassador.

24 **MR. NANDO de LUCA:** Okay. And did you end up
25 meeting with the Ambassador?

26 **MR. MICHAEL CHAN:** Yes.

27 **MR. NANDO de LUCA:** And that was Ambassador
28 Wang; correct?

1 **MR. MICHAEL CHAN:** That's right.

2 **MR. NANDO de LUCA:** Okay. And at that
3 meeting, was the Deputy Consul General Mr. Zhung also there?

4 **MR. MICHAEL CHAN:** No. I met Ambassador Wang
5 in Cambodia ---

6 **MR. NANDO de LUCA:** Right.

7 **MR. MICHAEL CHAN:** --- together with the
8 partner or possible partner from China and also the Consul of
9 Cambodia.

10 **MR. NANDO de LUCA:** Okay. And what was Zhao
11 Wei's and the Deputy Consul General Zhung's involvement in
12 that process?

13 **MR. MICHAEL CHAN:** Nothing.

14 **MR. NANDO de LUCA:** Nothing at all.

15 **MR. MICHAEL CHAN:** No. I just kind of like
16 ask Deputy Consul General Zhung to kind of like refer me to
17 Ambassador Wang once the reference for the contact is made,
18 so when I get to Cambodia, I arranged a meeting and talked to
19 Ambassador Wang.

20 **MR. NANDO de LUCA:** Okay. So if I understand
21 it, the Deputy Consul General Zhung was the one who set up
22 the meeting or made the introduction for the Ambassador in
23 Cambodia?

24 **MR. MICHAEL CHAN:** Did he set it up? Not
25 necessary.

26 **MR. NANDO de LUCA:** Did he make the
27 introduction?

28 **MR. MICHAEL CHAN:** He made the introduction,

1 definitely.

2 MR. NANDO de LUCA: Okay. And what was --
3 what was Zhao Wei's role? Because you said he was at a
4 meeting.

5 MR. MICHAEL CHAN: He just at the meeting.

6 MR. NANDO de LUCA: Which meeting was that?

7 MR. MICHAEL CHAN: The meeting in Toronto in
8 here.

9 MR. NANDO de LUCA: With the Deputy Consul
10 General?

11 MR. MICHAEL CHAN: That's right.

12 MR. NANDO de LUCA: Okay. Sir, switching
13 topics, do you recall a series of protests in Hong Kong from
14 the early -- mid-2019 into mid-2020?

15 MR. MICHAEL CHAN: Yes.

16 MR. NANDO de LUCA: Okay. And do you recall
17 making statements about those protests?

18 MR. MICHAEL CHAN: I -- yeah, yeah.

19 MR. NANDO de LUCA: Public statements.

20 MR. MICHAEL CHAN: Yeah, public.

21 MR. NANDO de LUCA: Okay. I'm going to refer
22 you to one of them.

23 Can I ask for COM multiple zeros 101 to be
24 called up, please?

25 --- EXHIBIT No./PIÈCE No. 101:

26 Article: Hong Kong Canadians question
27 alleged pro-Beijing backing for
28 prominent Liberal candidate [Global]

1 strictly handling unrest. Hong
2 Kong's government carefully defending
3 the rule, China's government
4 carefully observing Hong Kong." (As
5 read)

6 That's a quote that's attributed to you. Do
7 you recall saying that, sir?

8 **MR. MICHAEL CHAN:** I make the public
9 statement all in Chinese, okay.

10 **MR. NANDO de LUCA:** Right.

11 **MR. MICHAEL CHAN:** And this is a translation
12 of what I have said. And right now, I just cannot recall the
13 translation is the exact translation of what I have said. By
14 the way, I tried really to get my -- get the whole -- my
15 public statement whole to be here, but anyway, it can be more
16 or less, you know.

17 **MR. NANDO de LUCA:** More or less, does that
18 reflect your sentiments? You espoused a get tough approach
19 on the protestors in Hong Kong? Would that be fair?

20 **MR. MICHAEL CHAN:** I don't think that I used
21 the word "tough", okay. What I can remember my public
22 statement is unrest there and is quite bad. I actually kind
23 of like thinking about the unrest locally here with the truck
24 unrest and also the unrest in America which is June the 6
25 when I compare that. Those are all no good. And what I
26 meant is that we need the police to maintain -- to maintain
27 the law and order.

28 I think that's -- that was my remark and

1 intent, you know, which is few years ago.

2 **MR. NANDO de LUCA:** Last question.

3 **MR. MICHAEL CHAN:** Yes, sir.

4 **MR. NANDO de LUCA:** Sitting here today, do
5 you agree with how the government in China dealt with the
6 protests in Hong Kong between 2019 and 2020?

7 **MR. MICHAEL CHAN:** I don't -- I don't think
8 that your question related to our election during the '19 and
9 2021, but I'll answer that anyway. Can you repeat your
10 question one more time?

11 **MR. NANDO de LUCA:** Sure.

12 Do you agree with -- you indicated to me at
13 the outset that you recall the protests in Hong Kong between
14 2019 and 2020. And we had -- I asked you if this was a
15 correct quote or a translation of a quote attributed to you,
16 and you indicated more or less and you put a gloss on it.

17 I'm asking you a different question now.
18 Generally speaking, do you agree with how the government in
19 China dealt with the protestors in Hong Kong between 2019 and
20 2020?

21 **MR. MICHAEL CHAN:** I think the unrest in Hong
22 Kong is dealt with by the policemen of Hong Kong.

23 **MR. NANDO de LUCA:** Without any influence by
24 the government of China, the PRC government.

25 **MR. MICHAEL CHAN:** I do not know. I cannot
26 tell. I don't know. I wasn't in Hong Kong police.

27 **MR. NANDO de LUCA:** And do you agree with how
28 the police dealt with it?

1 **MR. MICHAEL CHAN:** Yeah. I mean, you know,
2 the police are there, you know, to maintain law and order, I
3 think. I mean, it apply to every other country, including
4 Canada.

5 **MR. NANDO de LUCA:** Thank you very much, sir.

6 **MR. MICHAEL CHAN:** Thank you.

7 **COMMISSIONER HOGUE:** Thank you.

8 The Human Rights Coalition.

9 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR**

10 **MS. SARAH TEICH:**

11 **MS. SARAH TEICH:** Good afternoon, Mr. Chan.

12 **MR. MICHAEL CHAN:** Good afternoon.

13 **MS. SARAH TEICH:** So I understand that you
14 requested an introduction to Ambassador Wang and you, in
15 fact, met with him following that introduction; correct?

16 **MR. MICHAEL CHAN:** Ambassador Wang in
17 Cambodia, yes.

18 **MS. SARAH TEICH:** Yes.

19 Was this introduction of value to you?

20 **MR. MICHAEL CHAN:** The meeting definitely is
21 valuable because it enhanced the promotion of that business,
22 yes.

23 **MS. SARAH TEICH:** Are you appreciative of the
24 value you received from Chinese officials?

25 **MR. MICHAEL CHAN:** It is a referral. As I
26 said before, we as -- you know, on trade in my past
27 experience as a Trade Minister getting diplomats and
28 councillors involved introduction and making the connection,

1 I mean, again, is common, of course, is variable and with the
2 business can be made and done. You know, that promote
3 economy. Yes.

4 **MS. SARAH TEICH:** Did you feel they did you a
5 favour?

6 **MR. MICHAEL CHAN:** Again, you know, I mean,
7 the -- you can consider it as a favour, but again, it's
8 common. It's very common ---

9 **MS. SARAH TEICH:** Do you feel ---

10 **MR. MICHAEL CHAN:** --- in international trade
11 or doing business.

12 **MS. SARAH TEICH:** I understand.
13 Do you feel it would be disloyal not to
14 acknowledge the favour?

15 **MR. MICHAEL CHAN:** When someone do you a
16 favour, remember it.

17 **MS. SARAH TEICH:** Do you feel it would be
18 disloyal not to return the favour?

19 **MR. MICHAEL CHAN:** Can you repeat your
20 question?

21 **MS. SARAH TEICH:** Do you feel it would be
22 disloyal not to return the favour?

23 **MR. MICHAEL CHAN:** Not necessarily. It
24 depend on what being asked.

25 **MS. SARAH TEICH:** Isn't your subsequent
26 behaviour consistent with the way that China treated you,
27 which was very nicely?

28 **MR. MICHAEL CHAN:** China treated me very

1 nicely? I don't -- I don't think anything special. I mean -
2 --

3 **MS. SARAH TEICH:** Is it your ---

4 **MR. MICHAEL CHAN:** --- your question is very
5 strange.

6 **MS. SARAH TEICH:** I'd still like you to
7 answer it, if you don't mind.

8 Isn't your subsequent behaviour consistent
9 with the way that China treated you, which was nicely?

10 **MR. MICHAEL CHAN:** My subsequent -- can you
11 repeat? I'm sorry.

12 **MS. SARAH TEICH:** Well, haven't you said
13 anything supportive of China? Have you done nothing to show
14 your appreciation?

15 **MR. MICHAEL CHAN:** You mean after this
16 particular favour ---

17 **MS. SARAH TEICH:** Yes, that's ---

18 **MR. MICHAEL CHAN:** --- and have I done
19 anything for the Chinese -- the China; right? Is that ---

20 **MS. SARAH TEICH:** Yes, that's right.

21 **MR. MICHAEL CHAN:** --- your question?

22 No.

23 **MS. SARAH TEICH:** And when it comes to China,
24 because you are grateful for them, for the value you
25 received, you're not objective on China. Is that not right?

26 **MR. MICHAEL CHAN:** Again, your previous
27 question is about someone give me a -- someone give me a
28 favour, do me a favour. And do I get that the -- return the

1 favour?

2 **MS. SARAH TEICH:** Yes, that's right.

3 **MR. MICHAEL CHAN:** Since after that meeting
4 and have I engaged the Chinese people? No. No. The
5 answer's no.

6 **MS. SARAH TEICH:** Haven't you said anything
7 supportive of China? Wouldn't that be considered a favour?

8 **MR. MATTHEW FERGUSON:** Madam Commissioner,
9 Matthew Ferguson, Commission counsel.

10 I'd just remind my friend that we're focused
11 on the 2019 and 2021 elections and we're a bit outside the
12 scope.

13 **COMMISSIONER HOGUE:** I agree. And you have
14 asked the question on a few occasions now, so I will ask you
15 to move on.

16 **MS. SARAH TEICH:** Sure.

17 You mentioned you met with Zhao Wei. In the
18 conversations that you had with Zhao Wei, did you pick up
19 that he was involved in foreign interference?

20 **MR. MICHAEL CHAN:** No. No.

21 **MS. SARAH TEICH:** Did it ever occur to you
22 that he was a foreign interference operative?

23 **MR. MICHAEL CHAN:** No.

24 **MS. SARAH TEICH:** All right. No further
25 questions. Thank you.

26 **COMMISSIONER HOGUE:** Thank you.

27 AG?

28 **MS. HELENE ROBERTSON:** No questions. Thank

1 you.

2 **COMMISSIONER HOGUE:** No questions?

3 Counsel for Michael Chan? Mr. Chapman?

4 **--- CROSS-EXAMINATION BY/CONTRE=INTERROGATOIRE PAR**

5 **MR. JOHN CHAPMAN:**

6 **MR. JOHN CHAPMAN:** For the record, my name is
7 Chapman, initial J.

8 Mr. Chan, I'm just going to ask you about
9 some of the allegations that have been made against you in
10 press reports. And I'm not going to flash up the documents
11 because it's late in the day, so I'm just going to sort of
12 read out some of the allegations and ask you about it.

13 There's an article by Mr. Cooper of Global
14 News in February 2023 that suggested that Chan had
15 orchestrated Tan's ouster with a campaign that persuaded
16 Justin Trudeau's aides to back Yaodong instead. And that Tan
17 would be Geng Tan, who had previously been the member for Don
18 Valley North.

19 Is that true? Were you part of some sort of
20 campaign?

21 **MR. MICHAEL CHAN:** Absolutely not true. I
22 mean, this is -- to me, is a fabricated story. I don't know
23 why Mr. Cooper would do that.

24 And by the way, counsel, can you raise your
25 voice a bit so that I can hear ---

26 **MR. JOHN CHAPMAN:** Okay.

27 **MR. MICHAEL CHAN:** --- better?

28 **MR. JOHN CHAPMAN:** And did you have any

1 discussions or interaction with the Prime Minister's Office
2 or his political operatives with respect to Geng Tan's
3 future?

4 **MR. MICHAEL CHAN:** No.

5 **MR. JOHN CHAPMAN:** The second article I want
6 to refer you to is a February 13th, 2023 article that my
7 friend, Mr. De Luca, had referred you to where there was a
8 suggestion that you had had meetings with Zhao Wei that were
9 election related. And ---

10 **MR. MICHAEL CHAN:** No.

11 **MR. JOHN CHAPMAN:** No.

12 And the third article I wanted to refer you
13 to is November 7th, 2022 article. Although it doesn't deal
14 with you specifically, it talks about the possibility that in
15 2019 there may have been a fund of perhaps \$250,000 that may
16 have been possibly directed towards 11 candidates.

17 Do you have any knowledge or involvement with
18 that?

19 **MR. MICHAEL CHAN:** No. This is -- you know,
20 I don't understand why these things were kind of like tied to
21 me. I mean, the -- I mean, you know, this is kind of like
22 bad actor or reporting. And I absolutely don't know and,
23 look, you know, media reporting it and it just so outrageous.
24 To get my name in there is -- is murderous.

25 **MR. JOHN CHAPMAN:** Now, Mr. Chan, did you
26 receive a summons that compelled you to testify here today?

27 **MR. MICHAEL CHAN:** Can you repeat?

28 **MR. JOHN CHAPMAN:** Did you receive a summons

1 from the Commission that compelled you to testify here today?

2 **MR. MICHAEL CHAN:** No.

3 **MR. JOHN CHAPMAN:** Are you appearing
4 voluntarily?

5 **MR. MICHAEL CHAN:** Oh, yeah. Yeah.

6 **MR. JOHN CHAPMAN:** Thank you. Those are my
7 questions, sir.

8 **COMMISSIONER HOGUE:** Thank you, sir.

9 Re-examination?

10 So thank you, Mr. Chan.

11 **MR. MICHAEL CHAN:** Oh, thank you.

12 **COMMISSIONER HOGUE:** We are done for the day,
13 so thank you.

14 It's 9:30 tomorrow morning, so see you all
15 tomorrow.

16 **THE REGISTRAR:** Order, please. À l'ordre,
17 s'il vous plait.

18 This sitting of the Foreign Interference
19 Commission has adjourned until tomorrow at 9:30 a.m. C'est
20 séance du la Commission sur l'ingérence étrangère est levée
21 jusqu'à demain à 9h30.

22 --- Upon adjourning at 5:44 p.m./

23 --- L'audience est suspendue à 17 h 44

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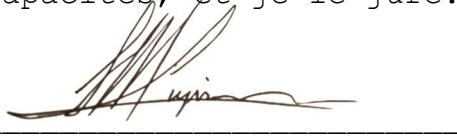
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C E R T I F I C A T I O N

I, Sandrine Marineau-Lupien, a certified court reporter,
hereby certify the foregoing pages to be an accurate
transcription of my notes/records to the best of my skill and
ability, and I so swear.

Je, Sandrine Marineau-Lupien, une sténographe officiel,
certifie que les pages ci-hautes sont une transcription
conforme de mes notes/enregistrements au meilleur de mes
capacités, et je le jure.



Sandrine Marineau-Lupien