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Key Questions for Participants in the Policy Phase Roundtables of the Public Inquiry into Foreign Interference in Federal Electoral Processes and Democratic Institutions

(October 20, 2024)

Set out below is the list of key questions Democracy Watch proposes must be asked of policy roundtable participants during the Policy Phase hearings of Public Inquiry into Foreign Interference in Federal Electoral Processes and Democratic Institutions ("Inquiry") from October 21 to 24, 2024 to ensure that it is made clear that there are significant gaps in several federal laws that make it legal for foreign governments, entities and individuals to secretly, unethically and undemocratically interfere in Canadian politics, especially given that enforcement of many of the laws is ineffective.

These questions need to be asked of roundtable participants this week because the Stage 1 Factual Phase and Stage 2 Factual Phase hearings of the Inquiry largely ignored these loopholes and flaws.

The gaps mean most foreign interference (FI) activities are unregulated, and most can be conducted in secret. No government agency or official has any power to track, monitor, investigate, prosecute or penalize many unethical and undemocratic foreign interference activities that are allowed to be done in secret.

NOTE: More information concerning the issues addressed in the key questions listed below can be seen in Democracy Watch's mid-September submission to the Inquiry. Click here to see the submission.

1. Questions for Participants in the Roundtable on Building Democratic Resilience Amid Value Conflict

(Monday, October 21, 2024, 9:00 am to 12:30 pm)

a) Given any regulation of foreign interference (FI) must comply with the rights and freedoms set out in Canada's *Charter*, isn't the Supreme Court of Canada's own egalitarian model the best framework to use as the basis for developing anti-foreign interference measures, given it is based on the three key democratic principles of: (i) ensuring equality of opportunity for equal participation and influence in all political processes; (ii) ensuring the

appearance of integrity, and actual integrity, of all political processes, and; (iii) ensuring voters are provided with key, accurate information to make informed choices in all political processes?

b) While Parliament has enacted Bill C-70 which requires foreign agents to register and disclose their foreign interference arrangement and activities, isn't it naïve to believe that foreign agent "proxies" of foreign governments, entities and individuals will register and comply with the provisions prohibiting such activities, especially given that all of the following 10 secret, unethical and undemocratic activities are still legal in Canada: (i) secret, unlimited spending in support of nomination contestants and party leadership contestants; (ii) secret, unethical lobbying activities; (iii) secret fundraising and campaigning for contestants, election candidates and political parties; (iv) one or a few individuals, acting as proxies, spending $1.6 million of their "own funds" during a pre-election and election period with no disclosure required of the source of the funds; (v) foreign governments, parties, businesses, organizations and individuals trying to influence voters during elections; (vi) secret bribery of someone who has just been elected as an MP or just announced to be appointed as a Senator; (vii) secret investments by Cabinet ministers, their staff and top government officials; (viii) secret jobs by MPs and senators; (ix) secret, unethical activities by the staff of MPs and Senators (who are not covered by any ethics rules), and (x) disinformation campaigns?

c) Given FI can be ambiguous, and modes of interference may shift, and it is difficult to prosecute FI (especially based on evidence gathered by intelligence services), and given raising public awareness and civic education doesn't actually do anything to prevent foreign interference activities, isn't enacting effective measures to prevent FI the best solution, as opposed to trying to catch it, investigate it after the fact, and possibly prosecute it years later?

2. Questions for Participants in the Roundtable on Diplomatic Perspectives on the Foreign Intervention 'Gray Zone'

(Monday, October 21, 2024, 1:30 pm am to 5 pm)

a) Given any regulation of foreign interference (FI) must comply with the rights and freedoms set out in Canada's *Charter*, isn't the Supreme Court of Canada's own egalitarian model the best framework to use as the basis for developing anti-foreign interference measures, given it is based on the three key democratic principles of: (i) ensuring equality of opportunity for equal participation and influence in all political processes; (ii) ensuring the appearance of integrity, and actual integrity, of all political processes, and; (iii) ensuring voters are provided with key, accurate information to make informed choices in all political processes?

b) While Parliament has enacted Bill C-70 which requires foreign agents to register and disclose their foreign interference arrangement and activities, isn't it naïve to believe that foreign agent "proxies" of foreign governments, entities and individuals will register and comply with the provisions

prohibiting such activities, especially given that all of the following 10 secret, unethical and undemocratic activities are still legal in Canada: (i) secret, unlimited spending in support of nomination contestants and party leadership contestants; (ii) secret, unethical lobbying activities; (iii) secret fundraising and campaigning for contestants, election candidates and political parties; (iv) one or a few individuals, acting as proxies, spending $1.6 million of their "own funds" during a pre-election and election period with no disclosure required of the source of the funds; (v) foreign governments, parties, businesses, organizations and individuals trying to influence voters during elections; (vi) secret bribery of someone who has just been elected as an MP or just announced to be appointed as a Senator; (vii) secret investments by Cabinet ministers, their staff and top government officials; (viii) secret jobs by MPs and senators; (ix) secret, unethical activities by the staff of MPs and Senators (who are not covered by any ethics rules), and (x) disinformation campaigns?

c) Given FI can be ambiguous, and modes of interference may shift, and it is difficult to prosecute FI (especially based on evidence gathered by intelligence services), and given raising public awareness and civic education doesn't actually do anything to prevent foreign interference activities, isn't enacting effective measures to prevent FI the best solution, as opposed to trying to catch it, investigate it after the fact, and possibly prosecute it years later?
d) Isn't it true that the members of the Panel of Five (the Critical Election Incident Protocol Panel) were all chosen by, and serve at the pleasure of, the Prime Minister and the federal Cabinet and, as a result, justifiably, would be viewed by the public as lacking independence from the ruling party?
e) Isn't it true that the Trudeau Liberals' Cabinet Directive for the Protocol has the following weak, secretive and ineffective rules?
    i. The Protocol is not legally binding on the Panel, and there are no penalties if the Panel violates any part of the Protocol;
    ii. The section 6.0 process sets as the threshold for informing the public of interference that the interference essentially must threaten the ability of the entire national election to be free and fair;
    iii. Even if the Panel decides (by consensus) that the interference meets the threshold, the section 5.0 process does not set any deadline by which the Panel is required to inform anyone of the interference;
    iv. The section 9.0 Assessment also does not set any deadline by which a so-called "independent" report is required to be released about the effectiveness of the Protocol at "addressing threats" during the previous election.
    v. The section 9.0 Assessment is done by whomever the ruling party Cabinet chooses, so the assessor is not independent in any way.

3. Questions for Participants in the Roundtable on Disinformation, Digital Space and Democratic Processes

(Tuesday, October 22, 2024 9:00 am to 12:30 pm)

a) Given any regulation of foreign interference (FI) must comply with the rights and freedoms set out in Canada's *Charter*, isn't the Supreme Court of Canada's own egalitarian model the best framework to use as the basis for developing anti-foreign interference measures, given it is based on the three key democratic principles of: (i) ensuring equality of opportunity for equal participation and influence in all political processes; (ii) ensuring the appearance of integrity, and actual integrity, of all political processes, and; (iii) ensuring voters are provided with key, accurate information to make informed choices in all political processes?

b) Isn't it true that, under Canada's federal election law (the *Canada Elections Act* (*CEA*)), many false claims (i.e. disinformation) that have political implications are already prohibited, and that, therefore, these prohibitions could easily be extended to prohibit all disinformation?

c) Given the Supreme Court of Canada has ruled in the cases *Irwin Toy* and *Ford* that only expressions that relate to the pursuit of truth are protected under the Charter right to freedom of expression, isn't there a strong argument that prohibiting all false claims, meaning all disinformation, is constitutional, as long as the enforcement system for prohibiting disinformation is not, in any way, under the control of the Cabinet?

d) Isn't it true that the Commissioner of Canada Elections (CCE), who enforces the current false claim/anti-disinformation provisions in the *CEA*, is appointed by the Chief Electoral Officer (CEO), and is not appointed by the Cabinet?

e) Isn't it true that the CCE could easily be appointed through an even more independent process (as could other federal enforcement entities), which would make the CCE and these other entities fully independent from government or political party influence, and that would likely pass a Supreme Court of Canada test under the *Charter* for enforcing a measure that prohibited all false claims (i.e. disinformation) in elections and all other political processes?

f) Isn't it true that Canada has already banned broadcasters and online sites that regularly post disinformation, and so it could, after making all key enforcement entities fully independent from the government and all political parties, have those entities also ban any site that refuses to effectively prevent the posting of disinformation?

g) Shouldn't there be clear rules in the *CEA* to prohibit businesses, organizations and individuals (including foreign governments, entities and individuals) from establishing online "media" outlets inside or outside of Canada, that are actually third-party advocacy outlets aiming to influence political processes and elections, including through disinformation?

h) Shouldn't there be clear rules in the *CEA* to prohibit businesses, organizations and individuals (including foreign governments, entities and individuals) from establishing a survey company that uses very questionable survey techniques that are not statistically valid, and then promoting the

results on social media and Internet sites and with media releases to try to influence voters?

i) Given everyone already knows that social media companies' algorithms make provocative disinformation go viral, isn't it very unlikely that requiring the companies to disclose their algorithms will lead them to change their algorithms, let alone allowing them to continue to self-regulate?

j) Isn't it true that, unless they have a comprehensive PhD in every issue area known to humans, and constantly and consistently update their knowledge in every issue area, including on daily and hourly developments, it is impossible for a member of the public to know whether a claim they see on social media or in the media is false?

k) Isn't it true that the two national surveys conducted in the past few years show that 70-75 percent of Canadian voters support regulating social media companies to prohibit and quickly remove false social media posts and fake accounts. Click here to see one survey (p. 5) and click here to see the other (pp. 15-16).

l) Given that, under the *CEA*, foreign governments, parties, businesses, unions, organizations and individuals are allowed to try to induce voters to vote, not vote, or vote in a specific way, wouldn't prohibiting this be a basic step to preventing foreign interference?

4. Questions for Participants in the Roundtable on Electoral Integrity: Nomination Contests and Leadership Contests

(Tuesday, October 22, 2024 1:30 pm to 5 pm)

a) Given any regulation of foreign interference (FI) must comply with the rights and freedoms set out in Canada's *Charter*, isn't the Supreme Court of Canada's own egalitarian model the best framework to use as the basis for developing anti-foreign interference measures, given it is based on the three key democratic principles of: (i) ensuring equality of opportunity for equal participation and influence in all political processes; (ii) ensuring the appearance of integrity, and actual integrity, of all political processes, and; (iii) ensuring voters are provided with key, accurate information to make informed choices in all political processes?

b) As a simple measure to prevent foreign interference, and as in elections and by-elections, shouldn't only Canadian citizens who are age 18 or older be allowed to vote in nomination contests and party leadership contests?

c) While Parliament has enacted Bill C-70 which requires foreign agents to register and disclose their foreign interference arrangement and activities, isn't it naïve to believe that foreign agent "proxies" of foreign governments, entities and individuals will comply with the provisions prohibiting such activities, especially given that it is still legal for a third party, whether a business, interest group or individual, to secretly spend an unlimited amount of money to support or oppose a nomination contestant or a party leadership contestant, with no registration or public disclosure required and no limits on the spending?

d) Just like during elections, and for the same reasons, shouldn't third parties be required to register and disclose their donors and spending during nomination contests and party leadership contests, and shouldn't third party spending be limited during contests?
e) Currently in pre-election and election periods, an individual who is acting as a third party is allowed to spend as much as a citizen group that has hundreds, thousands or tens of thousands of supporters using using up to $1.6 million of their "own funds" without any requirement to disclose the source of the funds – shouldn't a third-party individual be limited to spending a very small amount given they only represent one voter? Doesn't allowing a third-party individual to spend a very large amount make it easy for foreign governments, entities and individuals to funnel significant amounts of money to just a few "proxy" individuals in Canada to spend influencing elections?
f) Shouldn't businesses, which are directed by a few executives who only represent themselves and not shareholders or employees of the business, be prohibited from spending as a third party in the same way businesses are prohibited from making political donations?
g) Isn't it true that a large majority of donors donate only $75 annually to any of the main federal parties. But the federal annual individual donation and loan limit under the *Canada Election Act* (*CEA*) is $1,725 (in 2024, which increases by $25 annually) to a nomination contestant and an additional $1,725 to a party leadership contestant, and this allows those who can afford it to donate or loan up to 23 times what most donors donate, which makes top donors/lenders very valuable to contestants?
h) Isn't it true that the *CEA*'s high donation limit, combined with the fact that the identity of donors who donate less than $200 is not required to be disclosed, makes it easy for foreign governments, entities and individuals to funnel significant amounts of money through Canadian proxies to contestants? Wouldn't lowering the donation limit to the amount that a large majority of voters donate, namely $75, and requiring disclosure of all donors to Elections Canada, make this funneling of significant amounts of foreign money to contestants very difficult?
i) Given contestants are not required to disclose senior campaign workers or their volunteers, isn't it easy for foreign governments, entities and individuals to plant proxies into contestants' campaigns?
j) Given political party leadership contestants are required to disclose their donors before voting begins in the contest, shouldn't nomination contestants also be required to disclose their donors before voting begins in the contest?
k) Isn't it true that nomination contestants and party leadership contestants are allowed to choose their own auditor, which allows them to choose a "friendly" auditor who can easily cover up questionable donations and expenses? Wouldn't it be better to have a division at Elections Canada do their auditing?
l) Given the many examples of political parties unjustifiably shutting out nomination contestants, violating their own rules in nomination and party leadership contests, and covering up foreign interference in contests, isn't it clear that Elections Canada should be running contests in the same way that they run elections?

5. Questions for Participants in the Roundtable on Canada's National Security Apparatus

(Wednesday, October 23, 2024 9:00 am to 12:30 pm)

a) Is it true that the following enforcement officials, who all play key roles in monitoring, overseeing, and preventing foreign interference through Canada's national security apparatus, are all chosen by and serve at the pleasure of the ruling party Cabinet, and so can be removed from their position at any time for any reason:
   i. All members of the Critical Election Incident Protocol Panel;
   ii. Clerk of the PCO;
   iii. RCMP Commissioner and Deputy Commissioner, and the Commanding Officer of each Division of the RCMP;
   iv. Director of CSIS;
   v. Chief of the Communications Security Establishment ("CSE");
   vi. President and Executive VP of Canada Border Services Agency, and;
   vii. Director of Financial Transactions and Reports Analysis Centre of Canada.

c) Given they are all chosen by and serve at the pleasure of the ruling party Cabinet, wouldn't it be justifiable for the public to conclude that they lack independence from the Cabinet and may make decisions to protect the Cabinet instead of protecting the public interest?

d) Is it true that lawyers are exempt, under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (*PCMLTFA*), from the requirement to report their clients' suspicious transactions to FINTRAC?

e) While Parliament has enacted Bill C-70 which requires foreign agents to register and disclose their foreign interference arrangement and activities, isn't it naïve to believe that foreign agent "proxies" of foreign governments, entities and individuals will register and comply with the provisions prohibiting such activities, especially given that all of the following 10 secret, unethical and undemocratic activities are still legal in Canada: (i) secret, unlimited spending in support of nomination contestants and party leadership contestants; (ii) secret, unethical lobbying activities; (iii) secret fundraising and campaigning for contestants, election candidates and political parties; (iv) one or a few individuals, acting as proxies, spending $1.6 million of their "own funds" during a pre-election and election period with no disclosure required of the source of the funds; (v) foreign governments, parties, businesses, organizations and individuals trying to influence voters during elections; (vi) secret bribery of someone who has just been elected as an MP or just announced to be appointed as a Senator; (vii) secret investments by Cabinet ministers, their staff and top government officials; (viii) secret jobs by MPs and senators; (ix) secret, unethical activities by the staff of MPs and Senators (who are not covered by any ethics rules), and (x) disinformation campaigns?

6. Questions for Participants in the Roundtable on Enforcing, Deterring and Prosecuting Foreign Interference Activities

(Wednesday, October 23, 2024 1:30 pm to 5 pm)

a) Is it true that the following enforcement officials, who all play key roles in monitoring, overseeing, and preventing foreign interference through Canada's national security apparatus, are all chosen by and serve at the pleasure of the ruling party Cabinet, and so can be removed from their position at any time for any reason:
    i. All members of the Critical Election Incident Protocol Panel;
    ii. Clerk of the PCO;
    iii. RCMP Commissioner and Deputy Commissioner, and the Commanding Officer of each Division of the RCMP;
    iv. Director of CSIS;
    v. Chief of the Communications Security Establishment ("CSE");
    vi. President and Executive VP of Canada Border Services Agency, and;
    vii. Director of Financial Transactions and Reports Analysis Centre of Canada.

b) Given they are all chosen by and serve at the pleasure of the ruling party Cabinet, wouldn't it be justifiable for the public to conclude that these key watchdogs lack independence from the Cabinet and will likely make decisions to protect the Cabinet instead of protecting the public interest?

c) Is it true that the federal Chief Electoral Officer, Ethics Commissioner, Commissioner of Lobbying, Senate Ethics Officer and Public Sector Integrity Commissioner, all of whom also play key roles in monitoring, overseeing, and preventing foreign interference, are all chosen by the ruling party Cabinet through secretive, partisan, Cabinet-controlled processes with little or no input or involvement from opposition parties or any kind of independent vetting process?

d) Is it true that the federal Ethics Commissioner, Commissioner of Lobbying, Senate Ethics Officer and Public Sector Integrity Commissioner can all be reappointed for two or more terms only by the ruling party Cabinet, with no input required from opposition parties or any kind of independent vetting process?

e) Given they are all chosen by the ruling party Cabinet, wouldn't it be justifiable for the public to conclude that these key watchdogs will likely make decisions to protect the Cabinet instead of protecting the public interest?

f) Isn't it true that, under recently enacted Bill C-70, the new Foreign Influence Transparency Commissioner (FIT Commissioner) will also be chosen through a secretive, partisan, ruling party Cabinet-controlled process and will serve at the pleasure of a Cabinet minister?

g) Isn't it true that the Federal Court of Appeal ruled unanimously that the Cabinet is biased when choosing watchdogs that enforce laws that apply to government and politician actions and decisions (Click here for details).

h) Is it true that all of the key anti-foreign interference watchdogs, including the new FIT Commissioner, are allowed to make secret rulings, and are allowed to decide to not investigate a situation, no matter how clear the evidence is of a violation of the law, without ever having to justify that decision?
i) Isn't it true that all of the key anti-foreign interference watchdogs, including the new FIT Commissioner, are not required to investigate and rule on situations in a timely manner?
j) Isn't it true that all of the key anti-foreign interference watchdogs, including the new FIT Commissioner, are unaccountable to the public, and cannot be challenged in court if they fail to investigate a clear violation, or if they ignore evidence and the law and let someone off who clearly violated the law? (Click here for details)
k) While Parliament has enacted Bill C-70 which requires foreign agents to register and disclose their foreign interference arrangement and activities, isn't it naïve to believe that foreign agent "proxies" of foreign governments, entities and individuals will register and comply with the provisions prohibiting such activities, especially given that all of the following 10 secret, unethical and undemocratic activities are still legal in Canada: (i) secret, unlimited spending in support of nomination contestants and party leadership contestants; (ii) secret, unethical lobbying activities; (iii) secret fundraising and campaigning for contestants, election candidates and political parties; (iv) one or a few individuals, acting as proxies, spending $1.6 million of their "own funds" during a pre-election and election period with no disclosure required of the source of the funds; (v) foreign governments, parties, businesses, organizations and individuals trying to influence voters during elections; (vi) secret bribery of someone who has just been elected as an MP or just announced to be appointed as a Senator; (vii) secret investments by Cabinet ministers, their staff and top government officials; (viii) secret jobs by MPs and senators; (ix) secret, unethical activities by the staff of MPs and Senators (who are not covered by any ethics rules), and (x) disinformation campaigns?
l) Due to loopholes in Bill C-70, isn't it true that the following secret foreign interference and influence activities will continue to be legal, and foreign agents will not be required to register and disclose them in the Foreign Influence Registry (FIR) whenever it is actually established because these activities are not specifically mentioned or covered by the provisions in the new *Foreign Influence Transparency and Accountability Act* (S.C. 2024, c. 16, s. 113)?
    i. Activities to interfere in political party leadership contests;
    ii. Communications with nomination and party leadership contestants who are not MPs or Cabinet ministers, and election candidates who are not ministers;
    iii. Communications with people who have been elected as MPs or appointed as Senators but have not yet taken office;
    iv. Communications with territorial politicians and public officials, and provincial and municipal government appointees;
    v. Communications with judges and lieutenant governors;

vi. A foreign agent using a lobbyist as a “proxy” for their influence activities (many changes are needed to lobbying laws across Canada to prevent this), and;
vii. A foreign agent using staff, volunteers, friends, family and associates of contestants, candidates and parties as a “proxy” for their activities.

m) Isn’t it true that another major loophole left open by the provisions in Bill C-70 is that a foreign agent in Canada is allowed to have a secret arrangement with a foreign business, organization or individual, not controlled by a foreign government, to interfere in Canadian politics? And isn’t it true that the U.S. *Foreign Agents Registry Act* (*FARA*) does not have this loophole, and that anyone or any entity that has an arrangement with any foreign incorporated or established entity to interfere in U.S. politics is required to register in the U.S.?

n) Isn’t it true that Bill C-70 also gives the federal Cabinet broad discretion to:
i. Exclude foreign interference arrangements from the list of prohibited activities that are also required to be disclosed;
ii. Exclude public officials from the list of people foreign agents are required to disclose if they communicate with them;
iii. Limit the amount of information required to be disclosed in the FIR and to not require regular updates;
iv. Decide when the provisions that establish the FIT Commissioner and the FIR will come into force, and be extended to provincial, municipal and Indigenous politicians and public officials and, if amended, also territorial politicians and public officials (there are no deadlines in the Bill).

o) Is it true that lawyers are exempt, under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (*PCMLTFA*), from the requirement to report their clients’ suspicious transactions to FINTRAC?

p) Given the RCMP’s and FINTRAC’s very weak enforcement records in anti-corruption and money laundering cases, and given how the heads of the RCMP and FINTRAC are all chosen by and serve at the pleasure of the ruling party Cabinet, isn’t it clear that new, fully independent, well-resourced anti-corruption and anti-foreign interference police force should be established?

q) Do you think that police forces and police officers fundraising through foundations and selling products and services opens them up to donations from “proxies” of foreign governments, entities and individuals that could affect their law enforcement actions? To prevent the conflicts of interest caused by such fundraising, wouldn’t it be better to prohibit it?

7. Questions for Participants in the Roundtable on Electoral Integrity: Political Finance

(Thursday, October 24, 2024 9:00 am to 12:30 pm)

a) Given any regulation of foreign interference (FI) must comply with the rights and freedoms set out in Canada's *Charter*, isn't the Supreme Court of Canada's own egalitarian model the best framework to use as the basis for developing anti-foreign interference measures, given it is based on the three key democratic principles of: (i) ensuring equality of opportunity for equal participation and influence in all political processes; (ii) ensuring the appearance of integrity, and actual integrity, of all political processes, and; (iii) ensuring voters are provided with key, accurate information to make informed choices in all political processes?

b) While Parliament has enacted Bill C-70 which requires foreign agents to register and disclose their foreign interference arrangement and activities, isn't it naïve to believe that foreign agent "proxies" of foreign governments, entities and individuals will register and comply with the provisions prohibiting such activities, especially given that it is still legal:
    i. for a third party, whether a business, interest group or individual, to secretly spend an unlimited amount of money to support or oppose a nomination contestant or a party leadership contestant, with no registration or public disclosure required and no limits on the spending?
    ii. for a third party to secretly collude with a nomination contestant or party leadership contestant?
    iii. for a third party to secretly spend an unlimited amount of money trying to influence a policy-making process, with no registration or public disclosure required and no limits on the spending?

c) Just like during elections, and for the same reasons, shouldn't third parties be required to register and disclose their donors and spending during nomination contests, party leadership contests and policy-making processes, and shouldn't third party spending be limited during contests and policy-making processes?

d) Currently in pre-election and election periods, and even if current federal Bill C-65 is enacted, an individual who is acting as a third party is allowed to spend as much as a citizen group that has hundreds, thousands or tens of thousands of supporters, using up to $1.6 million of their "own funds" without any requirement to disclose the source of the funds – shouldn't a third-party individual be limited to spending a very small amount given they only represent one voter? Doesn't allowing a third-party individual to spend a very large amount make it easy for foreign governments, entities and individuals to funnel significant amounts of money to just a few "proxy" individuals in Canada to spend influencing elections?

e) Shouldn't businesses, which are directed by a few executives who only represent themselves and not shareholders or employees of the business, be prohibited from spending as a third party in the same way businesses are prohibited from making political donations?

f) Given contestants, candidates, electoral district associations (EDAs) and parties are not required to disclose senior workers or their volunteers, isn't it easy for foreign governments, entities and individuals to plant proxies into their operations and campaigns?
g) Isn't it true that a large majority of donors donate only $75 annually to any of the main federal parties. But the federal annual individual donation and loan limit under the *Canada Election Act* (*CEA*) is $3,450 (in 2024, which increases by $25 annually) to each party and its electoral district associations (EDAs), and this allows those who can afford it to donate or loan up to 45 times what most donors donate, which makes top donors/lenders very valuable to contestants?
h) Isn't it true that the *CEA*'s high donation limit, combined with the fact that the identity of donors who donate less than $200 is not required to be disclosed, makes it easy for foreign governments, entities and individuals to funnel significant amounts of money through Canadian proxies to contestants, candidates, EDAs and parties? Wouldn't lowering the donation limit to the amount that a large majority of voters donate, namely $75, and requiring disclosure of all donors to Elections Canada, make this funneling of significant amounts of foreign money to contestants very difficult?
i) Isn't it true that, due to a loophole in the *CEA*, anyone or any entity is allowed to offer anything, benefit or advantage (including a job) to anyone who is exploring being a nomination contestant or leadership contestant to attempt to induce them not to run, and that employers are allowed to give employees leave to run in a contest or election, both of which make it easy for foreign-owned or controlled businesses to influence who runs in contests and elections?
j) Isn't it true that allowing donations to nomination contestants, EDAs and candidates from outside the electoral district facilitates the funnelling of donations from foreign governments, entities and individuals into election processes across Canada, as happened in 2015 and 2016 when donors from B.C., some of whom were formerly connected to China's government, donated large amounts to a riding in Ontario and to Prime Minister Trudeau's riding in Quebec?
k) Is it true that, under the *CEA*, an authorized foreign bank is permitted to make a loan of an unlimited amount to a federal political party?
l) Isn't it true that a business, organization or individual can provide a product or service to a contestant, candidate, EDA or party and not be repaid for three years, which makes a mockery of the donation and loan limits in the *CEA*, and makes for an easy way for a foreign agent to do a valuable favour for a contestant, candidate EDA or party?
m) Given political party leadership contestants and third parties are required to disclose their donors before voting begins, shouldn't nomination contestants, election candidates and parties also be required to disclose their donors before voting begins?
n) Given third parties are only required to disclose their donors and spending before election day if they spend $10,000 or more, given that millions of voters can be reached through social media advertising for less than

$10,000, shouldn't third parties be required to disclose their donors and spending activities before voting begins if they spend more than $1,000?

o) Isn't it true that one third party can transfer funds to another third party, and then the receiving third party only has to disclose the giving third party as the donor, thereby hiding the actual source(s) of the funds? Doesn't this make it easy for a foreign government, entity or individual to use "proxy" organizations to fund the activities of many third parties, and so shouldn't this be prohibited?

p) Isn't it true that nomination contestants, candidates, electoral district associations (EDAs), party leadership contestants and third parties are allowed to choose their own auditor, which allows them to choose a "friendly" auditor who can easily cover up questionable donations and expenses? Wouldn't it be better to have a division at Elections Canada do their auditing?

q) Is it true that, under Canadian laws, it is unclear when a person elected in a federal election becomes an "official" as defined in section 118 of the *Criminal Code* (the section that defines "official" as it applies in the anti-bribery and anti-corruption provisions in sections 119-125 of the *Code*)? As a result, isn't it true that it is legal to bribe someone who has just been elected as an MP or just announced to be appointed as a Senator? Shouldn't this be cleared up to make it clear that it is illegal to bribe these people?