

SELECT SPECIAL DEMOCRATIC ACCOUNTABILITY COMMITTEE



Summary of Written Submissions: Recall Legislation

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INTRODUCTION

Pursuant to Government Motion 25, agreed to on June 18, 2020, the Assembly appointed the Select Special Democratic Accountability Committee. The Committee was appointed for the purpose of conducting a review of the *Election Act* and the *Election Finances and Contributions Disclosure Act*, and to address the questions posed by the Minister of Justice and Solicitor General in the document entitled “Proposed Questions for Review by a Standing or Special Committee” (Sessional Paper 192/2020).” The questions proposed in the Minister’s document relate to citizens’ initiatives and recall.

The questions posed by the Minister related to recall refer to British Columbia’s *Recall and Initiative Act*, R.S.B.C. 1996 c. 398 and are as follows:

Should Alberta adopt British Columbia’s (BC) framework for the recall of MLAs, including the general process and timelines with minor variations? Possible variations from BC’s model could be:

- What should the threshold be for a successful petition?
- Who is eligible to sign a petition?
- Should recall financing and advertising rules align with [the] *Election Finances and Contributions Disclosure Act*, R.S.A. 2000 c. E-2, (EFCDA) instead of following BC financing rules?

Should the framework for recalls of municipal elected officials and school board trustees mirror the framework for MLA recalls to the extent possible?

As part of its deliberations on recall, the Committee invited identified stakeholders to make written submissions until October 9, 2020. In addition, the Committee invited members of the public to make written submissions until September 25, 2020; however, at its meeting on September 24, 2020, the Committee agreed to extend the public submission deadline to October 9, 2020. This report summarizes issues identified and recommendations proposed in 17 written submissions. The Committee received one submission from Elections Alberta, two municipal associations, a constituency association, a registered political party, a registered third party advertiser, a Member of Parliament, a policy institute, and eight submissions from private citizens.

Please note that this document is not a comprehensive summary of all the opinions, comments, and issues raised by private citizens and stakeholders in their submissions. For the full text of all of the written submissions, please consult the internal Committee website. Each submitter’s full name and organizational affiliation, if any, are listed in section 6.0 of this document.

OVERVIEW OF ISSUES RAISED

None of the 17 submissions that discussed recall explicitly opposed recall legislation in Alberta. Instead, most submissions made suggestions about the ways in which the process could operate.

Some of the salient issues identified and commented on by members of the public and stakeholders in their written submissions to the Committee are categorized as follows:

Application Process and Recall Petition Period: submissions make suggestions on a number of issues, including defining the role of petitioners, application deadlines, the application fee, and the rationale for the recall petition. In addition, submissions make proposals with respect to concurrent and multiple recalls, defining the role of the Member named in the petition, and the length of the recall petition period.

Requirements for a Successful Petition: seven submissions make suggestions with respect to the threshold for a successful petition. Other submissions make recommendations with respect to eligibility to sign a recall petition, protecting electors' information, defining the roles of canvassers and observers, petition verification, the circumstances in which a recall petition should be cancelled, and the recall election.

Financing Rules: Elections Alberta recommends that the financial obligations for all recall participants be consistent with the requirements set out in the *Election Finances and Contributions Disclosure Act*. Other submissions discuss the role of the Chief Financial Officer, contribution limits, expenses limits, and financial reporting requirements.

Recall for Elected Officials and School Board Trustees: The two municipal associations oppose a recall process for municipal councillors, while other submissions express support. Only one submission supports recall of school board trustees.

General Comments: submissions in this category express support for the recall process. One submission raises a number of general considerations for the Committee. The "other comments" section summarizes the viewpoints of submissions that do not fall within the above categories.

SUMMARY OF WRITTEN SUBMISSIONS

1.0 APPLICATION PROCESS

1.1 Defining the Role of Petitioners

Elections Alberta recommends that the role of the recall petitioner be defined in legislation. In particular, the Committee may wish, in its review, to define who may apply for a recall petition and their rights, responsibilities, and limits during the recall period. Legislation should define the ability of the recall petitioner to advertise regarding the recall and what happens to the recall petition if petitioners become unable to perform their role.

The Rural Municipalities of Alberta states that “it is critical that recall campaigns may only be launched by individuals (not organizations or corporations).”

The Alberta Advantage Party recommends that the petitioner be an eligible voter in Alberta and must live in the electoral district in question.

1.2 Application Deadlines

Elections Alberta recommends “that recalls be prohibited for a reasonable period following the election of a member (by general election or by-election), as well as in the six months prior to a general election.” This ensures that new MLAs have an opportunity to perform their role prior to being subject to recall and ensures that recall activities and/or by-elections are not held right before a general election.

The Rural Municipalities Association recommends that recall campaigns “only be allowed during the same time period currently used in British Columbia (after the first 18 months following the election of an MLA and more than six months before the next scheduled general election).”

Sean Schaffer also notes that in British Columbia a recall petition cannot commence until 18 months after the last election and cannot take place within six months of the next general election. He believes this is a fair provision “because it gives the MLA a chance to prove themselves to their constituents, legitimized the mandate the MLA just received from voters, prevents a by-election so shortly after the last election, and prevents instances where a petition is started just because a small group of voters were unhappy with how their fellow Albertans voted.” Further, in Schaffer’s view, after 18 months, enough time has passed to evaluate the MLA’s performance. The six-month provision is also reasonable because it prevents a by-election occurring before a general election.

Brent Rathgeber, QC, recommends that where fixed election dates are in place, the recall process not be initiated within 12 months of the previous election or within 12 months of the next fixed election date because “recall should not be used to redo or repeat a recently held election,” nor be held when an election is imminent.

1.3 Application Fee

Elections Alberta recommends that “an application fee for a recall applicant be charged that is large enough to discourage frivolous recall petitions, but not so large as to limit access.” Elections Alberta further suggests that the Committee “may wish to consider a portion or the full amount of the fee to be refundable upon filing of financial returns, as is done with candidate election returns. A \$500 fee, refundable upon submission of the petition (complete or incomplete) and filing of a financial return, would be consistent with EFCD provisions.”

Sean Schaffer supports the application process set out in British Columbia's *Recall and Initiative Act*: the small fee and providing a written reason as to why the proponent is seeking a recall. He believes this is a fair system.

1.4 Application Rationale

The Alberta Advantage party recommends that the petitioner clearly state the reason for the recall petition in his or her application.

Terrance Van Gemert argues that recall should not be used because a political party is disliked; there must be "just cause" and it should "be clear." In his view, recall should only be for a "MLA [who] is not representing the people and failing to meet election promises, regardless of world issues. [The] election is a mandate on promises made which are not breakable intentions."

1.5 Concurrent and Multiple Recall Applications

Elections Alberta recommends prohibiting concurrent recall applications in the same electoral district to prevent circumventing expense limits.

Brent Rathgeber, QC, recommends that only one recall election may be held per electoral district per term and "no Member who survives a recall election should be forced to face a subsequent one."

1.6 Member Named in the Petition

Elections Alberta recommends that the role of the MLA named in the petition be defined in legislation. In particular, the Committee may wish to define the role of the MLA and their obligations and limitations during the recall process.

1.7 Recall Petition Period

Three submissions recommend a recall petition period for collecting signatures of 90 days (Alberta Advantage Party, Alberta Proud, Vitor Marciano).

2.0 REQUIREMENTS FOR SUCCESSFUL PETITION

2.1 Threshold

In its submission, Elections Alberta expresses concerns about frivolous and vexatious applications and the budgetary implications of administering the recall for Elections Alberta. Elections Alberta recommends "establishing a threshold for the number of signatures required ... that is sufficiently high to demonstrate the will of constituents, yet reasonably attainable in the time allotted." The submission notes that in the past 23 years, 26 recall petitions have started in British Columbia, but none have been completed: "[t]his suggests a threshold of 40 per cent may be too onerous."

Similarly, Lindsay Lahnau, Chief Financial Officer of the Alberta Party's Calgary-Currie Constituency Office, does not recommend adopting British Columbia's threshold. Noting the "historically low voter turnout in Alberta," she feels that a 40 per cent threshold "is much too restrictive."

The Alberta Advantage Party recommends that Elections Alberta reject the petition request if it is deemed frivolous or vexatious. It also recommends that the threshold for a successful recall petition be 20 per cent of the eligible voters in the electoral district.

Sean Schaffer supports the 40 per cent threshold required by British Columbia's *Recall and Initiative Act*. He notes that "40 per cent already represents a minority of voters, but is also a significant number when you factor in that only 40-70 per cent of voters actually get out to vote. If a 40 per cent threshold is reached, it is likely there are some serious grievances with that MLA" that need to be taken seriously. Conversely, if the threshold "is set too low, it could result in many MLAs being removed by petitions that only represent the opinions of a small minority of the riding and results in the MLA being soundly re-elected (while costing taxpayers for a by-election and preventing the MLA from being able to serve their constituents for a few months)."

Brent Rathbeger, QC, recommends that the threshold for a successful petition be 25 per cent because 40 per cent "is an artificially high bar to meet" given voter turnout in some elections.

Alberta Proud recommends a requirement of "signatures totally 66 per cent of the votes cast in the last election."

Al Boychuk suggests that the "the bar [be] set high enough to prevent making recalls another political arena [that political] parties can fight in."

2.2 Eligibility to Sign a Recall Petition

Elections Alberta recommends that electors ordinarily resident in the electoral district at the time of the recall petition be eligible to sign the recall petition because this "would be the simplest for all participants, ensur[ing] all eligible electors can take part, and reduce the privacy risks associated with sharing the List of Electors." This "simplifies work for canvassers and avoids the risks of sharing the List of Electors." The submission notes that if only electors who were included on the List of Electors in the last Provincial General Election for that electoral district are eligible to sign the petition, then "only electors on the post-polling-day List of Electors for the electoral district would be eligible to sign a recall petition." This "would require Elections Alberta to maintain a snapshot of the post-polling-day List. Authorized petitioners and their designates would require copies of the List to facilitate collecting signatures of qualified electors. Some electors will move or die after polling day, which will create additional challenges for canvassers to obtain a sufficient number of qualified signatures."

Conversely, Lindsay Lahnau, Chief Financial Officer of the Alberta Party's Calgary-Currie Constituency Office, argues in her submission that "the requirement that the voter lived in the district at the time of the election, which would disproportionately affect high turnover neighbourhoods such as the downtowns of our major cities" is "much too restrictive."

Alberta Proud recommends that signatures should only come from constituents. Vitor Marciano makes the same recommendation.

2.3 Protection of Electors' Information

Elections Alberta discusses the need to protect electors' information and recommends that the List of Electors not be utilized in recall legislation, given the risks of misuse and loss. Should recall legislation require the List be used, Elections Alberta recommends "that the protections related to access and use of the List be extended to all participants who access the Lists. This includes developing a policy consistent with CEO guidelines for use, protection, and disposal of the List."

Elections Alberta also notes that petition forms contain confidential elector information and recommends "that [petition forms] receive the same protections as the List of Electors. All completed pages of a petition" should be submitted to Elections Alberta. There should also be enforcement actions available to the Election Commissioner to ensure that all petitions with electors' personal information are collected if

the recall petitioner fails to submit them.

2.4 Role of Canvassers

Elections Alberta recommends that the role of the canvasser be defined in legislation. Specifically, Elections Alberta suggests defining the identification or information canvassers must provide to assure electors of their legitimacy. Canvassers should be required to abide by a code of conduct to ensure appropriate behaviour and protect personal information. Elections Alberta or the Election Commissioner should be given authority to follow-up on any reported misconduct.

2.5 Role of Observers

Elections Alberta recommends that the role of the observers be defined in legislation. In particular, Elections Alberta suggests that the Committee may wish to consider whether the MLA named in the petition can appoint observers to accompany canvassers collecting signatures. If observers are allowed, Elections Alberta recommends that they also be subject to a code of conduct.

2.6 Petition Verification

Elections Alberta notes that a verification process already exists for petitions to form a registered political party and recommends “a similar process be used for recall petitions.” This includes:

- ensuring all required information has been provided for each signature;
- reviewing signatory addresses to ensure they reside in the electoral district;
- ensuring the petition contains sufficient signatures; and
- phoning a random sample of electors to confirm their eligibility and signature on the petition.

2.7 Cancellation of a Recall Petition in Certain Circumstances

Elections Alberta recommends automatic cancellation of a recall petition if the Member’s seat becomes vacant because of the resignation or death of the Member during the recall process.

2.8 Recall Election

Sean Shaffer supports the process in British Columbia, where if a recall petition is successful, the MLA is removed from office and a by-election must be called within 90 days. He notes that “currently, vacancies in the [Alberta] Legislative Assembly are filled in by-elections which can be called up to six months after the seat becomes vacant.” In the case of a recall, he believes “this is too long. As the MLA was removed rather than resigned, they should have an opportunity to prove they still have a mandate to serve as soon as practical.” Schaffer suggests that this “becomes even more important during a minority government as the vacancy could result in a shift in the balance of power.” In his view, “90 days gives enough time for every party to nominate a candidate and plan an election while ensuring the seat is not left vacant for too long.”

Brent Rathgeber, QC, recommends that any Alberta recall legislation explicitly state that “a recalled member may run in the subsequent byelection.”

Terence Van Gemert recommends a recall election period of eight weeks.

3.0 FINANCING RULES

3.1 Election Finances and Contributions Disclosure Act (EFCDA)

Elections Alberta recommends that the financial obligations for all recall participants be consistent with requirements set out in the EFCDA and integrated into the EFCDA.

3.2 Chief Financial Officer for Petitioner

Elections Alberta recommends that the role of the Chief Financial Officer (CFO) of the recall petitioner be defined in legislation. Elections Alberta recommends that “[a] petitioner be required to appoint a CFO to accept contributions within contribution limits and manage expenses within spending limits. CFO requirements should align with EFCDA rules for candidates.”

The Alberta Advantage party similarly recommends that the petitioner have a registered financial agent.

3.3 Contribution Limits

Elections Alberta recommends that the Committee define “contributors” – i.e., “who can contribute to a recall petitioner, the MLA named in the petition, third party advertisers and other groups promoting or opposing the petition. Contribution rules should specify whether contributions apply to annual limits and whether they are eligible for tax credits.”

The Alberta Advantage Party recommends that the contribution limits to a recall petition be the same as those for a candidate in a provincial election. Further, “[d]onations made to a recall petition [should] not affect a person’s ability to donate to a political party, constituency, or candidate.” Donations to a recall petition should be tax deductible as they are “for a political party of a candidate.”

Ed Broadbent, Chair of the Broadbent Institute, recommends that individual donations “be capped to be no more than the current allowable amount for provincial elections” in order to “increase accountability for recall.”

3.4 Expenses Limits and Reporting Requirements of Political Parties

Elections Alberta recommends defining “the role of registered political parties in supporting or opposing the MLA named in the petition. For example, should political parties be subject to expense limits and financial reporting requirements in respect of a recall petitions.”

3.5 Advertising

Sean Schaffer suggests that both petitioners and the MLA for whom the petition be used against be given equal opportunity “to advertise their case (provided they are not using public funds).”

3.6 Third Party Advertising

Elections Alberta recommends that the role of third party advertisers be defined. In particular, the Committee may wish to consider “if third party advertisers can raise funds and advertise for or against the Member who is the subject of a recall process.” If third party advertisers are allowed, Elections Alberta recommends “amending to the EFCDA to include requirements for their financial registration, reporting, and expense limits.”

Ed Broadbent, Chair of the Broadbent Institute, recommends that “there should be no role for independent third party advertisers” in the recall process. In his view, “[i]f a group wants to spend on one of these votes, they should be registered as either a proponent or an opponent, and the spending limits should be conservative in nature. Any other advertising should be strictly prohibited.”

The Alberta Advantage Party recommends that there be no third-party advertiser involvement in the recall process, no out-of-province advertising permitted, and no political action committees.

3.7 Financial Returns

Elections Alberta notes that British Columbia’s *Recall and Initiative Act* requires a recall petitioner to submit their financial returns within 28 days following the recall petition in order for the petition to be successful. Elections Alberta notes that this a “very tight timeline” and “not consistent with other reporting timeframes” in Alberta’s EFCDA. Elections Alberta suggests that “reasonable timelines should be set” when considering whether the success of a recall petition depends on signatures alone or on signatures and a petitioner’s reporting obligations.

4.0 RECALL FOR MUNICIPAL ELECTED OFFICIALS AND SCHOOL BOARD TRUSTEES

4.1 Opposition to the Recall of Municipal Elected Officials

The Alberta Urban Municipalities Association (AUMA) asserts that there is “no need for recall provisions for municipal elected officials as there are already existing legislative mechanisms to remove councillors from office in specific circumstances.” In addition, the AUMA encourages the Committee to consider a number of practical implications for small municipalities, specifically:

- the ability for a small number of individuals in a community to create instability and have undue influence on council composition;
- that it is not uncommon for councillors to be acclaimed (i.e., the Committee “should be mindful of situations where there were no voters in the previous municipal election”); and
- that a recall process is costly, especially for smaller municipalities with limited administrative capacity.

Finally, the AUMA suggests that if the Committee determines that “a framework for the recall of municipal elected officials is sound public policy,” it recommends “that any recall legislation for local elected officials should align with recall provisions for provincial elected officials, with consideration that thresholds for petitions or other recall mechanisms should vary based on the size of the constituency.”

Rural Municipalities of Alberta similarly opposes the application of recall legislation to local authorities. Like the AUMA, RMA notes that recall legislation has the potential to duplicate and erode the accountability mechanisms already in place in the *Municipal Government Act*, R.S.A. 2000, c. M-26, (MGA) adding “an additional layer of complexity, red tape and costs to local government by opening the door to the electorate using recall to respond to unpopular council decisions that are made in accordance with the MGA, and forcing a costly by-election.” The RMA notes that the MGA contains tools for both councillors and the public to raise concerns. In particular, the submission notes that

section 571 of the MGA allows the electorate to submit a petition to the Minister of Municipal Affairs to trigger an inspection of the municipality. The items inspected may include the conduct of a councillor (s. 571(1.1)(b)). As a result of the inspection, the Minister may make an order dismissing a councillor. Therefore, mechanisms already exist that allow the electorate to report and expect action on perceived irregular councillor conduct, while ensuring that a thorough, provincially-led inspection

takes place before any action is taken. Recall legislation would subvert the current investigative process and allow the electorate to initiate a recall process without any formal investigation taking place.

Al Boychuk opposes recall legislation for both municipalities and school boards.

4.2 Support for the Recall of Municipal Elected Officials

The Alberta Advantage Party supports the recall of municipal officials and school board officials and recommends that the rules for these processes be “the same as they are for the MLA recall.”

Similarly, Alberta Proud recommends that the framework for the recall of municipal officials mirror where possible that of MLAs, but “[s]chool trustees, who can be fired by the Education Minister, should not be subject to recall.”

Vitor Marciano states that the recall “framework should apply to municipal politicians but would likely never be used for trustees.”

5.0 GENERAL COMMENTS

In its submission, the United Conservative Party of Alberta highlight[s] several commitments within its policy platform that it considers relevant to the Committee’s work. With respect to recall, the submission notes the party’s intent to “[i]ntroduce a Recall Act based on precedents in several jurisdictions, including the United Kingdom, the United States, and in British Columbia.”

Lindsay Lahnau, Chief Financial Officer of the Alberta Party’s Calgary-Currie Constituency Office, supports “the proposed recall legislation that passed first and second reading in 2019.”

Damien Kurek, MP, Battle River-Crowfoot, expresses support for recall legislation noting that it plays “a critical role in the ability for people to hold government to account between elections.”

Alberta Proud expresses support for the recall process in general and in British Columbia, in particular, noting that in British Columbia, “even when a petition doesn’t result in a completed recall,” it often results in the resignation of politicians “when they know they will be recalled.”

Vitor Marciano expresses support for recall legislation in Alberta and “the BC law is a great place to start.”

Sean Schaffer supports recall legislation in Alberta but believes there should “be safeguards in place to prevent misuse.” In particular, he suggests that “the recall solution should be fair in all situations,” including in a majority government situation or in a minority government. He encourages the Committee to consider “how the legislation will be impactful as a member of the government caucus and as a member of the opposition ... [how it may be] used against you or a close colleague.” Schaffer suggests that another “point to consider is how to prevent a government from disregarding this legislation.” He notes that recall legislation was introduced by Premier Aberhart back 1936. “However, Premier Aberhart promptly repealed the law the moment he personally became subject to a recall petition.” Schaffer suggests that there “should be some safeguards in place to prevent a future government from repealing the legislation the moment it becomes inconvenient to them.” He notes that “this may not actually be possible while maintaining the principle that a previous legislature cannot bind a future legislature.”

5.1 Other Comments

Frank Jenkins encourages the Committee to consider academic research in its decision-making.

Pastor Rother Alford, former leader of the Alberta Social Credit Party, recommends the ability to elect and recall the Lieutenant Governor.

Wayne Moorhead recommends that any MLA “who changes political affiliation” must resign and a by-election be called.

6.0 LIST OF WRITTEN SUBMISSIONS

| Abbreviation | Individual | Organization | File Number |
|--------------|--|---|--------------|
| Van Gemert | Terrance Van Gemert | Private Citizen | DAC-2020-013 |
| AUMA | Barry Morishita, President and Chair | Alberta Urban Municipalities Association | DAC-2020-029 |
| Jenkins | Frank Jenkins | Private Citizen | DAC-2020-032 |
| Boychuk | Al Boychuk | Private Citizen | DAC-2020-035 |
| Schaffer | Sean Schaffer | Private Citizen | DAC-2020-040 |
| Broadbent | Ed Broadbent, PC, CC, Chair | Broadbent Institute | DAC-2020-048 |
| RMA | Al Kemmere, President | Rural Municipalities Association | DAC-2020-051 |
| EA | Glen Ressler, Chief Electoral Officer and Election Commissioner | Elections Alberta | DAC-2020-052 |
| Alford | Pastor Robert Alford, former Leader of the Alberta Social Credit Party | Private Citizen | DAC-2020-057 |
| AAP | David Inscho, President | Alberta Advantage Party | DAC-2020-059 |
| Moorhead | Wayne Moorhead | Private Citizen | DAC-2020-064 |
| Luhnau | Lindsay Luhnau, Chief Financial Officer | Alberta Party Calgary-Currie Constituency Association | DAC-2020-068 |
| Kurek | Damien C. Kurek | Member of Parliament, Battle River-Crowfoot | DAC-2020-073 |
| UCP | Dustin Van Vugt, Executive Director | United Conservative Party of Alberta | DAC-2020-077 |
| Rathgeber | Brent Rathberger, QC* | Private Citizen | DAC-2020-081 |
| AB Proud | Alberta Proud | Registered Third Party Advertiser | DAC-2020-085 |
| Marciano | Vitor Marciano | Private Citizen | DAC-2020-089 |

* Mr. Rathberger's submission includes an attachment: Bill C-697 tabled in the House of Commons on June 17, 2015.