

DIE Board Hearing Application

Please note that this information will all be public. While the UASU's practice is to redact email addresses and phone numbers from publicly posted DIE Board hearing applications, the information provided may be kept, used, and disclosed in keeping with the operations of the DIE Board, UASU Bylaws, and Alberta's Personal Information Protection Act.

If necessary, the Students' Union DIE Board Registrar may contact you to confirm that you are a student.

NOTE: Under the DIE Board Protocols, the DIE Board reserves the right to reject applications that it judges to be frivolous or vexatious.

Name	Lisa Glock
E-mail	[REDACTED]
Phone Number	[REDACTED]
This application is for a:	Appeal of a Chief Returning Officer Ruling

Reason for Application

Describe the specific violation of a bylaw or rule, your specific interpretation question, or the specific errors made by the DIE Board or the CRO. If you want the Board to issue some kind of order, explain what you think the Board should do. You may also attach additional written submissions or supporting documents at the end of this form.

Reason

This document is a response from the Lisa Glock Campaign to the UASU's Chief Returning Officer Ruling, March 12, 2024 Ruling #17. It is an appeal to have the ruling overturned and a challenge to the evidentiary claims made in the ruling. The Lisa Glock campaign asserts that candidate Lisa Glock was rightfully elected President of the UASU and was wrongfully disqualified with no evidentiary basis.

Proposed Respondent(s)

List the individual(s) alleged to have infringed a rule or who are otherwise adversely involved in interest to your application. If you are appealing a CRO Ruling, list the CRO and any candidates involved.

Proposed Respondent

- Lisa Glock, Presidential candidate
- Students for Justice in Palestine, third-party
- Michael Griffiths, Presidential candidate and Complainant
- Sithara Naidoo, Deputy Returning Officer
- Jacob Verghese, Chief Returning Officer

Anticipated Witnesses

List other individuals involved in the case who can contribute to the Hearing, if any.

Anticipated Witness

Aoife Devlin-O'Connor

Signature



Attach File

Although not required, you may attach additional written submissions or supporting documents for the Board to consider, including any relevant facts, a copy of any Students' Union legislation or rules relevant to your arguments, and your position on the matters in issue. These submissions will help the Board understand the nature of your complaint or request for interpretation. The Board may rule against you if you do not provide sufficient reasons for your application.

Please submit as a single document.

If you're unsure of how to combine multiple separate documents, you can save all documents as a PDF and use [PDF Merge](#).

File upload



Appeal to UASU Chief Returni... .pdf

Direct any questions to:

DIE Board Registrar

governance@su.ualberta.ca

SUB 6-24

Appeal to UASU Chief Returning Officer Ruling March 12th, 2024 Ruling #17 March 14, 2024

Lisa Glock

Parties to the Ruling and Appeal

- Lisa Glock, Presidential candidate
- Students for Justice in Palestine, third-party
- Michael Griffiths, Presidential candidate and Complainant
- Sithara Naidoo, Deputy Returning Officer
- Jacob Verghese, Chief Returning Officer

Introduction:

This document is a response from the Lisa Glock Campaign to the UASU's Chief Returning Officer Ruling, March 12, 2024 Ruling #17. It is an appeal to have the ruling overturned and a challenge to the evidentiary claims made in the ruling. The Lisa Glock campaign asserts that candidate Lisa Glock was rightfully elected President of the UASU and was wrongfully disqualified with no evidentiary basis.

General Comments:

The allegations listed in the ruling from the CRO relies extensively on anonymous and unverified evidence, including significant amounts of hearsay and second or third-hand information. It is impossible to establish the veracity of anonymous accusations, even if their comments were damning, which we will establish, they are not. Anonymous actors are incapable of establishing that they are acting in good faith, or if they may have motives or interests that could draw into doubt their testimony.

Additionally, the DIE board should be aware of the fact that the CRO Jacob Verghese and the Complainant are friends and the subsequent facts should be evaluated in the light that CRO Verghese has a personal interest in the outcome of these proceedings.

Responses to the Ruling:

This document will address each line of the ruling one after the other, each ruling will be noted in bold and italics, followed by the Lisa Glock campaign's response.

1. The Complainant, Michael Griffiths, filed a complaint at 1:51 on March 11, 2024 as supplementary evidence to the CRO's Ruling 6.

2. On March 6, 2024 at 10:07, while the Election Office was questioning Lisa Glock about her relationship with SJP, Glock expressed the findings outlined in ruling 6. In short, she affirmed her lack of intent in any proxy campaigning initiated by SJP. On the March 6 call, as well as a call on March 11 at 18:00 between Glock and the Election Office, Glock expressed that she only came to the realization of problems regarding potential third-party bylaws on Tuesday, March 5 at 16:42 – when she messaged

the Election Office about third-party, specifically SJP, concerns. However, the arguments and evidence provided to the Election Office since the March 6 call put Glock's statements into question.

Response: Lisa Glock had no relationship to or responsibility for the actions of SJP. The Lisa Glock campaign, Lisa Glock, or any officers of the campaign have not made any misrepresentations to any Election Office officials during or after the campaign period. Subsequent responses will establish that the Lisa Glock campaign is not and could not be responsible for the actions of third party students or student groups.

RULING: 3. Griffiths alleges the following:

- a. Contravention between Lisa Glock and the SJP occurred over a prolonged period.***
- b. Glock's relationship with SJP's election activities was in fact intentional.***
- c. Glock did not act in good faith in dealings with the Election Office.***

Lisa Glock met with SJP once in February. Glock had no relationship with SJP and was not responsible for their conduct or behaviour. SJP, as any student or student group, is free to endorse any candidate or issue they chose and were not involved in the Glock campaign, per SU bylaw 320:

"12.1 Any Member, with the exception of the C.R.O., the D.R.O.s, and incumbent Members of the Executive Committee who are not also Candidates shall be free to endorse or Volunteer for any Candidate.

Good faith is a broad term that's used to encompass honest dealing. Depending on the exact setting, good faith may require an honest belief or purpose, faithful performance of duties, observance of fair dealing standards, or an absence of fraudulent intent. Glock had no fraudulent intent, she had honest beliefs, and an honest purpose. She faithfully performed her duties and held to fair dealing standards to the best of her knowledge and ability.

There is no evidence that Lisa Glock or the Lisa Glock campaign staff acted in bad faith or colluded with any third party intentionally in the course of this election.

RULING: 4. The evidence presented by Griffiths is as follows:

- 4a. Audio file from February 22, timestamped at 15:03. This date is relevant as it was 4 days before the campaign period started. This audio invalidates Glock's statements that her relationship with SJP's election activities does not seem intentional.***

RESPONSE: The audio file does not present any new information. It indicates that Glock met with SJP, which was not a secret. Glock indicates that she knew they would be releasing their views on candidates' stances on Palestine with a focus on incumbents.

Student groups and individual students are free to discuss their issues with candidates and may make decisions on who they endorse. Candidates are often encouraged to meet with student groups that may be impacted by Students' Union activity. This is not a violation of election rules.

Additionally, this meeting was not a contravention of SU bylaws pertaining to “pre-campaigning,” per Bylaw 320, 11.4: “Social media and internet activity with the sole purpose to prepare Campaign activities, Campaign Material, or to solicit Volunteers may be undertaken during the Pre-Campaign period, so long as it is kept private.” This meeting was to prepare Campaign activities by consulting with a campus stakeholder group.

RULING 5: i. The audio confirms Glock’s relation to a “friend who is kind of in the SJP” and her knowledge that SJP is going ahead with a “whole Palestine thing during the race”.

RESPONSE: The ruling did not make any argument as to how these statements contravene SU bylaw. Glock indicating that she has a friend in the SJP and that she was aware of their upcoming commentary on the election is not a violation of any election rules.

RULING 6: ii. The audio shows Glock affirming that SJP intended to “target” incumbent candidates, which would include Griffiths’ campaign.

RESPONSE: Glock was aware that SJP would focus on incumbent candidates, because incumbents have a track record to examine and draw from, as they had been executives for the previous year. The use of the word “target” was intended to convey the fact that incumbents’ track records as Executives would be a focus of SJP’s posts. Glock was not aware that the SJP would focus on Griffiths in particular.

SJP is not affiliated with the Glock campaign and are free to make any endorsement or determination on who they support based on any information about a candidate they have, including information derived from being incumbent candidates.

RULING 7: iii. This evidence is supported by a second audio file from an anonymous individual dated for February 22 sent to the Election Office by an individual, in which Glock confirms her understanding that SJP is “not a student group so the UASU can’t really control what they do”. Glock attests to a “mild concern” about SJP endorsements breaking election rules.

RESPONSE:

The full quote from the transcript is as follows: “I don't think that's breaking any rules [because] I literally have no say in what [SJP are] doing, but yeah I am mildly concerned but I'm going to see what happens.” Glock’s mild concern pertained to whether the SJP’s own activities would break any rules, however Glock believed in good faith that rules were not being broken at the time of the recorded call.

When the SJP’s elections activity started to grow as the campaign progressed, Glock recognized that there may be election rules being broken, at which time she reached out to the Elections Office on March 6.

The Glock campaign did not violate any election rules in receiving third-party endorsements which is explicitly permitted by the Bylaws. It is entirely appropriate for candidates in private communications to express a desire to follow campaign rules to volunteers, rules that were followed by the Glock campaign.

Aoife Devlin-O'Connor, campaign manager and primary volunteer for the Lisa Glock campaign, attests that Ali Ansari was not amongst the volunteers.

RULING: b. Vandalized campaign materials by groups associated with Glock, exemplified by: i. Posters were covered by other posters and some posters were fully taken from where they were posted, specifically by the SJP picks posters and pamphlets. This is relevant to Glock because she posted an endorsement by Prometheus Voaklander (Research Lead for the SJP). ii. Several posters were stamped over with a “Ceasefire now, free Palestine” stamp, which indicates a possible connection to SJP.

RESPONSE: The Glock campaign and its volunteers have never vandalized any campaign materials. Glock did not direct others to vandalize materials. This complaint and ruling provides no evidence to support a claim that the Glock campaign had any involvement in any acts of vandalism.

RULING: iii. Lawn sign was removed and found in the bushes

RESPONSE: The CRO provides no evidence of who moved this sign, or how the Glock campaign could be held responsible for such an action if it did occur. The Glock campaign ensured its officers and volunteers complied with election rules.

RULING: c. Griffiths “faced a sharp rise in online backlash” after the SJP posted their election picks, as well as harsh and untrue labelling (sic). (ie: Instagram comment “Hell nah last thing I want is a racist white man running for SU president disgusting”; the CRO overheard SJP members call Griffiths “Islamophobic” while they were tabling in CAB on March 5).

RESPONSE: The Glock campaign explicitly condemns any language characterizing Mr. Griffiths as Islamophobic or any similar bullying language. This comment did not come from any officer or volunteer of the Glock Campaign and consequently, the Campaign cannot be held liable for any third party.

Glock signed onto a letter alongside other candidates denouncing bullying. In the post dated March 6, 2024, the letter stated, “We the candidates would like to make it clear that we do not stand for any form of bullying, harassment, hate speech, or discrimination on the basis of gender, sexuality, religious beliefs, **political beliefs**, and racial identity.”

The Glock Campaign is not responsible for comments made by individuals online, but despite this, Glock chose to limit comments on their campaign posts to stop any potential hateful comments that were within their power to prevent.

RULING: 5. The evidence is further supported by an individual who wishes to remain anonymous and sent information to the Election Office in writing and on the phone:

a. In an off-campus meeting on February 14, 2024 – 12 days before the campaign period started and two days before the candidates meeting Glock informed this individual that she was meeting with SJP regarding helping her with her campaign. The individual attests that Glock specifically named Ali as one of her primary contacts at SJP. In this meeting, Glock also explained to the individual that SJP

would be releasing “report cards” on candidates’ stances on Palestine and that SJP would be making recommendations for how students should vote.

RESPONSE:

The Glock campaign engaged in consultation with the SJP and many other student groups and students from a wide range of political backgrounds and interests, as is the right and responsibility of anyone running in a UASU election race. It is the right of any student or student group to decide to support or endorse any candidate they choose based on their stance on any issue of importance to them. Lisa Glock met with SJP only once in February.

RULING: b. Further confirmation on Glock’s behalf regarding SJP’s report card release was communicated in a voice memo to this individual on February 22. This is the same audio file referred to by Griffiths in his complaint.

RESPONSE:

The Glock campaign has never intended to hide that it consulted with students with views on the liberation of Palestine. It is not a violation for any candidate or potential candidate to consult with any students, student groups or students of particular background. SJP is unaffiliated with the Glock campaign, as are the dozens of student groups who have been consulted by all candidates in this race.

RULING: c. On February 27, this individual received a screenshot from Glock of Ali’s close friends story on Instagram, “in which he denounced anyone who voted for Presidential candidate Michael Griffiths”.

RESPONSE:

The Glock campaign is not responsible for the private statements of any students expressing their views on the election. Students have a protected right to endorse or support, and to express their support for, the candidate(s) of their choice. The Glock campaign has denounced any bullying or negative language against any candidate in any race, including against the Griffiths campaign

RULING: d. SJP publicly released their “SJP Picks” on Instagram (@sjp.uofa) on February 27 in support of Glock and aggressively denouncing Griffiths. In reference to the February 14 meeting mentioned above, the Election Office has reason to believe that Glock was more involved in this activity than she made it seem. Furthermore, the individual attests that “. In a conversation with Glock, she told me that Griffiths would be the only candidate receiving a public denouncement from the SJP.” This further shows that Glock was most likely aware and contributing to the efforts of SJP to publicly shame and attack Griffiths’ character.

RESPONSE:

The ruling provides no evidence that the Glock campaign was involved in any decisions or comments that were made by SJP, a third party over which the Glock campaign had no control. If the Elections Office has any “reason to believe” that this was the case, they do not provide any evidence of this characterization. The Glock campaign continuously denounced any personal attacks or bullying of any candidates, including Mr. Griffiths, as evidenced by the Glock campaigns signatory to the Anti-Bullying joint campaign statement.

RULING: 6. In the call with Glock on March 11, Glock upheld the same story as March 6. When the Election Office asked Glock if she was in communication about SJP activities with any other candidates. She attested that she had told other candidates that SJP was going to be making voting recommendations. When asked who she spoke to, she said that she shared that information with multiple candidates but was only able to state one specifically (VP External candidate Logan West). On March 11 and 12, the Election Office called all candidates in the General Election to inquire if Glock told them about the SJP Picks coming out. All individuals said no, except Logan West.

RESPONSE:

There are no SU Bylaws requiring a candidate to share information with other candidates. Therefore, this aspect of the ruling is not relevant to the issue at hand.

RULING: 7. Glock’s relationship with Ali, an active member of SJP is worth looking into: a. The anonymous individual referenced in point 5 of this section shared that Glock referred to Ali as an “unofficial second campaign manager” many times in conversation over the course of the pre-campaign ad campaign periods. When asked about this campaign title, Glock said that she “might have called him [her] secondary campaign manager” but it was not meant seriously.

RESPONSE:

Ali was not involved in the Glock campaign. Glock does not recall calling Ali her “secondary campaign manager,” and she affirms that any similar statement would have been made as a joke. As Glock’s personal friend, he provided moral and emotional support to her, but was not involved in the campaign.

This section of the ruling does indicate any election rules being broken by Glock. Again, Glock is not responsible for comments made by individual students.

RULING: b. Glock posted a video in the days leading to voting addressing her stance on Palestine during the campaign period, which was reposted by SJP with their additional commentary directed towards Griffiths. The anonymous individual was informed by Glock that Ali had helped her with the video.

RESPONSE:

SJP had no part in planning or releasing this video and the words and opinions expressed are solely those of the Glock campaign. The decision to repost Glock’s video was SJP’s alone.

Ali lent Glock their camera to use for the video. The use of a personal camera to produce digital campaign materials does not contravene SU Election Bylaws.

RULING: c. The individual believes that Ali has a high-ranking position within SJP, as he was seen tabling for them in front of APIRG in HUB Mall. He was also the SJP member that Glock gave stickers to, as outlined in ruling 6.

RESPONSE:

The Glock campaign and Lisa Glock personally have no knowledge of the inner workings of SJP. Glock has no knowledge of who is or who is not a member of the third-party organization aside from her personal friend as previously mentioned.

The Glock Campaign would accept the fines and outcome of CRO Ruling 6. Retrying these accusations amounts to retrying this case in contravention of basic principles of justice. No substantive new evidence or conclusions can or should be drawn since this previous ruling.

RULING: i. Ali's relevance in SJP is further supported by statements from other individuals interviewed by the Election Office who wish to remain anonymous. These conversations were recorded, some in writing and some as audio files. Secondary information states that throughout the election season, "Ali took an election focussed role" and he was "previously active but didn't have as big of a role as the election period".

RESPONSE:

Again, Ali had no involvement in the Glock campaign.

RULING: ii. The initial anonymous individual also expressed that "Glock's relationship with Ali was also publicly witnessed by many people on the evening of March 7th, after the election results, as he was in attendance with her at Dewey's despite not being on Glock's approved guest list." Another individual who wishes to remain anonymous attests that at Dewey's after the election results, Ali introduced himself to them as President of the SJP.

RESPONSE:

It is not a violation for candidate Glock to have celebrated her election victory with friends after the campaign period had concluded. Further, this is not evidence of any alleged campaign violation.

RULING: 8. The initial anonymous individual also shared that they witnessed a call on March 5 at 19:02 between the Election Office and Glock on the topic of SJP's possible third-party involvement with Glock's campaign. The individual attests that Glock "lied" to the Election Office and "downplayed her involvement with SJP as she is affiliated with the group, was meeting with them multiple times a

week, and was aware and contributing to a lot of their activities over the course of time before her nomination package was received, the pre-campaign period, and the campaign period itself.”

RESPONSE:

The Glock campaign only met with SJP once in order to consult with them as a group on their issues and concerns as students. Lisa Glock is not and has never been a member of or affiliated with SJP, and did not have knowledge of their inner workings or decision making processes. The assertion that Glock lied about or downplayed her involvement is categorically false.

RULING: 9. In their statement, the individual concludes that “Ali, through SJP, essentially functioned as Glock’s volunteer, and I believe Glock never got approval, nor expensed any of the campaign materials SJP and Ali used to campaign for her (including the signs at the SJP tabling, SJP pamphlets and several posts on the SJP account). I believe that Glock’s involvement with the SJP tainted the integrity of her race, as well as the integrity of the entire election. I strongly believe that she was aware of the group’s intention to slander and denounce Griffiths, which not only happened at the SJP tabling but also online, and I believe these actions contributed and led to the hostility and harassment Griffiths endured during the campaign.”

RESPONSE:

As previously stated, Ali did not act as a volunteer for the Glock Campaign. The Campaign expensed all materials as required by SU Bylaws, and the mistake made regarding providing campaign materials to Ali personally has been addressed in Ruling 6, which the Glock Campaign accepts.

The Glock Campaign was aware that the SJP intended to endorse candidates, however was not party to any discussions around the content of those endorsements, nor was she aware of any plans to slander or denounce other candidates. The Glock Campaign explicitly denounces any slander or personal attacks against Mr. Griffiths, and is unaware of the identity of any student who may have made any personal attacks against any other candidate.

RULING:

Ruling

If Glock attested a “mild concern” about SJP endorsements breaking election rules since February 22, yet did not communicate any of this to the Election Office until March 6, there is a violation of bylaw 320.11.5ab. This withheld information also falls into bylaw 320.11.1c which requires candidates to report any contravention of a bylaw, rule, regulation, or order to the CRO immediately. The Election Office concludes that Glock did not act in good faith towards her opponent (Griffiths) or the Election Office in multiple instances. This contravenes bylaw 320.11.1c.: The Election Office concludes that they were misled by Glock while investigating her about ruling 6. While working on ruling 6, Glock was firm in her stance that any activities that appear correlational between herself and SJP were unintentional. However, evidence was brought to the attention of the Election Office in Griffiths’ complaint and anonymous complaints that prove that Glock lied. Furthermore, Glock’s understanding of SJP’s plans to “target”

Griffiths' campaign as a third-party while not communicating it with neither Griffiths nor the Election office is in bad faith.

Penalty

In light of Bylaw 320.17.4abc, the penalty for Glock's bylaw contraventions, harm done to the fairness of the election, and intentional misrepresentation of information to the Election Office is a disqualification of the candidate.

Appeal

Rulings of the CRO may be appealed to the DIE Board by current undergraduate students, using the DIE Board Application Form, within 12 working hours of the ruling being posted. This ruling was posted at 8:00 AM on Wednesday, March 13th and the deadline for appeal is 11:00 AM on Thursday, March 14th

RESPONSE:

The Glock Campaign does not believe that the evidence presented in this ruling proves any bad faith or malicious action. The Campaign has clearly established that both the Candidate and the Campaign are unaffiliated with SJP. Students and Student groups have protected Charter Rights of Freedom of Expression enabling them to engage in UASU elections to endorse any candidates or advocate for any issues they so choose, and the campaign did not violate any campaign rules by consulting with students or student groups.

The broad assertions of the above ruling are patently incorrect and the Glock Campaign rejects them as having a poor evidentiary basis and with no precedent in past CRO or DIE board rulings. In particular, we assert that established legal precedent in EO 2019 Ruling #5 establishes that third parties are allowed to endorse or support candidates, and that campaigns cannot be held liable for the actions of these third parties. There the board ruled:

EO 2019 Ruling #5: In 2019, a complaint was made to the DIE Board that a third-party (in this case, *Le Mouton Noir*) had interfered in a Presidential campaign. The publication wrote an article that presented one candidate in a positive light, and another candidate in a negative light. In addition, the author of the article was affiliated with the campaign that was promoted positively. The DIE Board ruled that the Presidential Candidate was not in contravention of SU Bylaw.

Lisa Glock was dutifully and rightly elected President of the UASU and disqualifying a successful candidate for the reasons alleged in the March 12th CRO ruling would be an enormous overreach and set a dangerous precedent regarding the expression of students' democratic rights as members of the Union.