

DIE Board Respondent Application

Application to respond to an application for a hearing or appeal.

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 respondent 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 Michael Griffiths

E-mail [REDACTED]

Phone Number [REDACTED]

I would like to respond to the following DIE Board Application:

(Provide the Case Number or briefly describe the Applicant and what the Applicant is claiming.)

HA08

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 and use [PDF Merge](#).

File upload



DIE Board Appeal Response.pdf

Direct any questions to:

DIE Board Registrar

governance@su.ualberta.ca

SUB 6-24

- Contains the most relevant evidence to this case. Some evidence, that demonstrates the backlash I faced online following SJPs campaign, is omitted for brevity and relevance but can be provided if needed.

Relevant Legislation

Nomination Package

“Volunteers” (page 5)

- Volunteers, defined as anyone who assists in any campaign activity, are bound by the same rules as candidates. It is the candidate’s responsibility to inform their volunteers of election rules. Candidates are responsible for the actions of their volunteers and may be subject to penalties as a result of their volunteers’ conduct.

Bylaw 320:

Definitions:

7. “Campaign Activity” shall be any act, planned or organized by or on behalf of any Candidate that is calculated to convince Members to vote in a given way;
8. “Campaign Expense” shall be any and all expenditures incurred in engaging in Campaign activities;
9. “Campaign Materials” shall be any physical or electronic media produced or distributed as part of Campaign activities;
37. “Volunteer” shall be any individual who assists in Campaign activities;

11. Campaign Procedures

1. Each Candidate or side manager shall act reasonably and in good faith, and specifically shall
 - a. ensure that each Volunteer engaging in Campaign activities on their behalf is aware of all bylaws, rules, regulations, and orders;
 - b. ensure that each Volunteer is in compliance with all bylaws, rules, regulations, and orders while engaging in Campaign activities on their behalf; and
 - c. report any contravention of a bylaw, rule, regulation, or order to the C.R.O. immediately.
5. A Candidate or side in a Students’ Union election may distance themselves from a third party in the event the third party effectively conducts Campaign activities under the following conditions:
 - a. the Candidate or side must demonstrate to the C.R.O. that the third party acted without the consent of the Candidate or side; and
 - b. the Candidate or side must demonstrate to the C.R.O. that steps have been taken to distance themselves from the third party and to attempt to halt unauthorized Campaign Activity by that third party.

17. Penalties

1. Where a Candidate, Volunteer, or side has contravened a bylaw, rule, or regulation, regardless of the cause or the intent of the parties involved, and that contravention has provided an unfair advantage to a Candidate or side, the C.R.O. shall assign a penalty that
 - a. fully counter-balances any advantage gained; and
 - b. where the contravention was intentional, penalizes the Candidate, Campaign manager, or side manager who was or whose Volunteer was guilty of the contravention.
4. A Candidate or side shall be disqualified where they are guilty of a contravention that
 - a. cannot be counterbalanced by a lesser penalty;
 - b. is malicious or substantially prejudicial to another Candidate or side; or
 - c. involves tampering with ballots, voting procedures, or counting procedures.

Other Relevant Rulings (and their most relevant/ applicable findings)

- [CRO Ruling #6 – March 7th](#)
 - o The ruling operates on the assumption that “Glock’s relationship with SJP’s election activities do not seem intentional.
 - o “The Election Office does not wish to disqualify Glock from the election race as it is an extraordinary remedy.”
- [CRO Ruling #17 – March 12th](#)
 - o “Glock expressed that she only came to the relation 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.”
 - o The audio file confirms Glock’s knowledge (as of at least February 22nd) that SJP would be “targeting” incumbent candidates. She found this out from “her friend in SJP.”
 - o A second audio file confirms Glock’s 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 their involvement breaking election rules (this audio is also dated February 22nd).
 - o Griffiths faced online backlash after SJP posted their elections picks, as well as harsh and untrue labelling. The CRO also overheard SJP members call Griffiths “Islamophobic” while they were tabling in CAB on March 5th.
 - o This evidence is further supported by an individual who sent information to the Election Office in writing and on the phone.
 - o In a March 11th call between the Election Office and Glock, she attested that she shared that the SJP would be making recommendations with multiple candidates, but could only name one. The Election Office called all candidates to ask if Glock had informed them about the SJP picks. All individuals said no except the one that Glock was able to name.
 - o An anonymous individual confirmed the following: Glock often referred to Ansari as an “unofficial second campaign manager,” Ansari helped Glock with a campaign video that was reposted by SJP and had commentary toward Griffiths, Ansari was a

high ranking individual in SJP, Ansari was the one tabling in CAB and HUB, and Ansari was present at Dewey's with Glock to celebrate results, despite not being on the approved guest list. Another anonymous individual attests that at Dewey's Ansari introduced himself to them as President of the SJP.

- The anonymous individual also shared that Glock "lied" to the Election Office and downplayed their involvement with SJP" in a March 5 call at 19:02 that they witnessed.

- [DIE Board Ruling 2023-01-R – March 7, 2024](#)

- The ruling offers guidance to the Elections Office for their Ruling #6 on the assumption that "the candidate received an alleged endorsement from a third-party group on campus with whom the candidate is allegedly unaware of having any affiliation with."
- The ruling offers guidance to the Elections Office for their Ruling #6 on the assumption that "there was an alleged secondary distribution of campaign materials to this third-party group during their campus tabling activities and the election candidate has allegedly noted that they were unaware of this secondary distribution of campaign materials occurring."
- The ruling offers guidance at the time based on the notion that "there has been no evidence provided of direct collusion between the third-party group and the election candidate."
- The ruling states that to satisfy the two criteria in Section 11(5), the candidate must demonstrate that a third party acted without their consent and the candidate must make active steps to distance themselves from the third party. If the steps are not to the satisfaction of the CRO, they may issue punitive fines.
- The ruling states that disqualification in terms of section 11(5) alone, would have to be egregious enough that it satisfies one of three criteria: if a penalty cannot be counterbalanced by a lesser penalty, if activity is malicious or substantially prejudicial to another candidate or side, or if the activity involved tampering with ballots, voting procedures, or counting procedures.
- Disqualification is an extraordinary remedy, the actions of a candidate would have to exceed the simple behaviour of breaching section 11(5).
- Disqualification should not be the first resort of the CRO as this is an extraordinary remedy.

- [DIE Board Ruling 2023-02-R – March 12, 2024](#)

- "The creation of the campaign video meets the definition of Campaign Activity. Glock's friend was present during the filming of this video, and thus participated in the Campaign Activity becoming a Volunteer."
- "The audio file from February 22, 2024 suggests Glock was aware of the activities SJP would be pursuing and thus could be deemed a Campaign Activity on her behalf"
 - The ruling indicates that based on the audio file alone, the two criteria set out in Bylaw 320 Sec 11(5) are satisfied.
- "Lisa Glock has an affiliation with SJP through a volunteer and her involvement in planning certain campaign activities."

Discussion of Glock's appeal and responses

Glock's assertions in her appeal are given in bolded italics, with my responses listed in bullet form underneath.

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.

- I expect the Elections Office to provide testimony and written submissions about the additional evidence it cites in Ruling #17. While I respect the desire to verify the integrity of anonymous submissions, I expect the Elections Office and the DIE board to find a way to hear or consider these statements in a way that maintains the safety of the provider. I personally have faced extensive backlash throughout this campaign, and I have no doubt that others submitting information that would impact Glock's candidacy would encounter the same. I ask that the DIE board facilitates in-camera hearings with witnesses where necessary or accepts their submissions in writing, to preserve their anonymity and thus their safety. Additionally, testimonies should be heard with critical considerations, but also taken in good faith and without assuming ulterior motives unless there is evidence to do so.
- In good faith, I have long acknowledged my friendship with CRO Verghese and both of us have taken steps to ensure elections are conducted fairly despite this. Throughout the election, whenever possible, responsibility has been delegated to DRO Naidoo to make decisions pertaining to me or the presidential race. When I interviewed the Elections Office regarding my complaint, I explicitly asked for DRO Naidoo to be the one to deliver any rulings to avoid a perceived conflict of interest. There is an inevitable possibility that friendships will exist among actors in this space. Throughout the election, both CRO Verghese and I have acted in good faith and taken steps wherever possible to limit the impact our friendship has on elections. The actions of the Elections Office and myself should be assumed in good intent, unless given a reason to do so otherwise, and neither Verghese nor I should be punished for a prior relationship when steps have been taken to limit its impact. To my knowledge, no concerns were raised by Glock's campaign at any earlier point throughout the election, so I urge caution when considering them now, as they have only been raised in light of the impact of ruling #17.

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.

- DIE Board Ruling 2023-02-R establishes that “Lisa Glock has an affiliation with SJP through a volunteer and her involvement in planning certain campaign activities.” It also establishes that “the audio file from February 22, 2024 suggests Glock was aware of the activities SJP would be pursuing and thus could be deemed a Campaign Activity on her behalf.”
- Glock took steps to distance herself from the third-party later on which, with the evidence DIE Board had at the time, satisfy the two criteria of Bylaw 320 sec 11(5) to them. However:
 - o Per Bylaw 320 sec 11(1) – each candidate has the responsibility to act in good faith and shall ensure that: their volunteers engaging in campaign activities are aware of bylaws; to ensure volunteers are in compliance with bylaws; and to report any contravention of a bylaw to the CRO immediately.
 - o Evidence submitted by me and others, establishes that Ansari is affiliated with SJP and that DIE Board has determined qualifies as a volunteer with Glock’s campaign. Evidence is also submitted demonstrating them tabling, telling students who to vote for in the election, on at least two occasions.
 - Glock repeatedly stated at the appeal that led to the 2023-02-R DIE Board Ruling that “[Ansari] is not with my campaign,” despite outlining their affiliations in that hearing that DIE Board used to find Ansari qualifies as a volunteer for Glock’s campaign.
 - o The CRO heard Ansari tabling in CAB on March 5th refer to Griffiths (me) as “Islamophobic” when telling students who to vote for during the election. Without basis for doing so, a volunteer for Glock’s campaign telling students that I am “Islamophobic” and therefore not to vote for me, clearly qualifies under Bylaw 320 Sec 17(4) as “malicious or substantially prejudicial to another candidate” and therefore is grounds alone for disqualification.
 - Evidence is also included of Ansari, a volunteer with Glock’s campaign, also posting a story stating “if you vote michael for SU president ur actually a bot...” This simply indicates the further willingness and precedent for Glock’s volunteer to slander my image and denounce students who support me.
 - Ansari tabled on two separate occasions and it is unclear how many students were reached by this. While one instance is enough, it can be assumed beyond a balance of probabilities that the narrative shared with students throughout Ansari’s tabling was at least similar to what the CRO witnessed.
 - o Glock waited until March 5th at 16:42 to inform the elections office about concerns regarding potential third-party bylaws, stating she only just came to the realization. Yet, the two audio files submitted dating February 22nd, are evidence that Glock knew SJP would be “targeting” incumbent candidates (which includes me), and that she had “mild concerns” about SJP endorsements breaking election rules and had been thinking about the subject.
 - This is in contravention of Bylaw 320 Sec 11(1)c. because Glock did not inform the CRO immediately but instead waited until confronted. Additionally, it is Glock’s responsibility as a candidate to be familiar with

Bylaw 320 and to uphold her volunteer team to the highest standards of behaviour towards other candidates (per page 3 of nomination package)

- Points 2, 5d, 6, 8, and 9 in ruling #17 substantiate how Glock's campaign misinformed and deceived the Elections Office during the campaign. While most of the evidence for these claims comes from other sources, the evidence I have included does support these assertions, in part.

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.

I find this section lofty and difficult to interpret specifically, but here is the evidence I have and my comments:

- Ruling #17 indicates that the Elections Office has received additional information since March 6th which call into question Glock's assertion that she only met with SJP once and that she has not colluded with them intentionally. Aside from the audio recordings that I have supplied which demonstrate that Glock knew SJP intended to "target" me, most of the evidence to support this claim is not supplied by me. I presume that the elections office did not falsify their evidence for these claims.
- I have indicated above how Bylaw 320 Sec 11 which requires Glock and candidates to act in good faith was violated. In summary, Glock failed to ensure that at least one of her campaign volunteers adhered to bylaws, and failed to report contraventions to the CRO immediately, as required. This resulted in Ansari, her campaign volunteer, openly slandering me to students in a way that is "malicious or substantially prejudicial," which is grounds for disqualification under Bylaw 320 Sec 17(4)b.
- The parallel between SJP and "any student or student group" is misleading. It is established that SJP is not a student group, and thus qualifies as a third-party under bylaws.

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.

- Glock is repeatedly reframing the audio recording to suggest she knew that SJP would be releasing their views on candidates’ stances on Palestine. The exact phrase used was “my one friend who is kind of in the SJP [area, thing,] how they might be going doing a whole Palestine thing within the race. Well it looks like that’s going ahead, [so] but I wanted to let you know that they are just going to be targeting returning candidates who didn’t do anything in their role for Palestine...”
 - o While Glock stated in an earlier appeal that the use of the word “target” was accidental and she did not intend it like that, this word and the audio must be taken at face value because that is what she said.
 - o It is also worth clarifying that SJP is not a registered student group, as is suggested by the above claims.
- I agree with Glock that Bylaw 320 Sec 11(4) is not contravened by her reaching out to SJP or Student Groups. However, I have outlined how other sections of Bylaw 320 were breached.
- The audio file(s) do present new evidence:
 - o Ruling #17 indicates that Glock told the Elections Office that she only realized potential problems regarding third-party bylaws on Tuesday March 5 at 16:42. However, the audio recording clearly indicates that Glock was aware of potential concerns and was thinking about this topic at least as early as February 22nd. Therefore, Glock lied to and deceived the Elections Office and failed to report these concerns to the CRO immediately, which is in violation of Bylaw 320 Sec 11(1) and (1)c requiring her to act in good faith.
- It could also be argued that Glock violated her duty to act in good faith by not informing the Elections Office that candidates might be at safety risk when she learned that SJP would be “targeting” some candidates. It is somewhat unclear to what extent Glock knew what the details of this “targeting” would look like, although it could be argued beyond a balance of probabilities that she was privy to some of this information given that her “friend” and campaign volunteer was involved and, in many cases, leading and committing this behaviour.
 - o Glock’s relationship with Ansari is demonstrated to be very close by several pieces of evidence, potentially more that I have not included, which would sway this beyond a balance of probabilities.
 - Glock referred to Ansari as “a shoulder to cry on” in an earlier DIE Board appeal.
 - Ansari attended Dewey’s with Glock to celebrate the results, despite not being on her guest list provided to the elections office.
 - Ansari was present during the filming of at least one of Glock’s campaign videos.
 - Glock gave three campaign stickers to Ansari for “personal use” while tabling in CAB.

- Photos are provided of Ansari tabling on two occasions, encouraging students to vote for Glock (among other messaging).
- Ruling #17 suggests the Elections Office has received evidence from other sources demonstrating Glock and Ansari's relationship.
- DIE Board has ruled that Ansari qualifies as a volunteer on Glock's campaign. Aside from their friendship, it is expected that Glock has a responsibility for and would have a comprehensive understanding of the activities of her volunteers.

The ruling did not make any argument as to how these statements [referring to the audio file] 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.

- Glock indicated in this audio that she was aware there may be concerns about these activities contravening bylaws, and neglected to inform the CRO, which violates Bylaw 320 Sec 11(1). It potentially also violates Sec 11(5), as the audio calls into question any steps that Glock took after to distance herself from the third-party and why these steps were only taken when promoted by the Elections Office on March 6th when Glock knew of the concerns at least as early as February 22nd.

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.

- DIE Board ruling 2023-02-R has already determined that "Glock has an affiliation with SJP through a volunteer and her involvement in planning certain Campaign Activities." Any assertion that Glock is not affiliated with SJP has been ruled false.
- I want to believe that Glock was unaware SJP would target me to the extent they did (genuine and founded criticism of my campaign and endorsing Glock is okay, slandering, attacking, and promoting misinformation towards me or my campaign is not). However, Glock's tendency to lie to and deceive the Elections Office, and her proven close relationship with Ansari, who evidence suggests is quite involved with SJP and who engaged in baseless, malicious and substantially prejudicial behaviour towards me, gives me reasonable doubt as to whether she knew or consented to the behaviours that targeted me and my campaign.
- Ansari's simultaneous status as a high-ranking official within the SJP and a campaign volunteer for Glock, makes it unlikely that Glock was unaware the SJP would focus on me to the extent they did. Further, Ansari engaged in this behaviour targeting me, despite Glock's responsibility to ensure her volunteers adhere to all bylaws.

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

- Bylaw 320 Sec 11(1) (specifically 1c) outlines that candidates have a responsibility to report a contravention to the CRO immediately. If Glock thought she was potentially violating bylaws she would have a duty to report it to the CRO. Even if Glock only thought that SJP or another third-party might be violating bylaws and not her campaign, she still had a responsibility to report it to the CRO and chose not to. Further, her responsibility to act in good faith would require her at least consult with the CRO and raise potential contraventions if she was unsure, which the audio recording clearly indicates that she had at least some doubt. As Ansari, a notable member of SJP, has been established as a campaign volunteer for Glock, she has the additional responsibility to ensure that all their actions comply with bylaws. Glock failed to do this as the evidence demonstrates multiple contraventions on Ansari's part, thus putting Glock in violation of Bylaw 320 Sec 11(1).
 - o Glock clearly indicated in the audio recording that she had concern that there may be a contravention of bylaws. Since Glock failed to report this to the CRO, she is therefore in violation of Bylaw 320 Sec 11(1).
 - o Even if Glock thought bylaws were not being contravened, since there were clearly contraventions, and it is Glock's responsibility as a candidate to be familiar with all bylaws, she would still be in contravention of Sec 11(1).
- Despite Devlin-O'Connor's attestation, DIE Board has already determined that Ansari qualified as a campaign volunteer for Glock, and she is then in contravention of several bylaws. Volunteer status is determined by the definition set out in Bylaw 320, not by whether or not an individual "signed up" officially to volunteer for a candidate's campaign.

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.

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.

- I have included evidence of several of my campaign materials being vandalized or destroyed. While the stamped posters align with the narrative of others who I have demonstrated are guilty of contraventions against me, I have no evidence of who was involved in this vandalism and recognize that without that it cannot be attributed to the Glock campaign.

- I have already demonstrated above that the Glock campaign did not, on several occasions, ensure that its officers and volunteers complied with election rules, and therefore reject that assertion.

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.

- I first want to note that in her appeal Glock does not dispute that Ansari called me “Islamophobic” and labeled me with this narrative to convince students to vote for Glock instead. Her appeal acknowledges that Ansari committed these comments and only disputes that Ansari is a campaign volunteer. Once established that Ansari is a volunteer for Glock, should Glock fall back on a narrative that Ansari was not guilty of these claims, this assertion should be rejected.
- I have demonstrated above, and evidence has been provided, that Ansari, an established volunteer on Glock’s campaign, engaged in behaviour telling students that I am “Islamophobic” and publicly encouraging students not to vote for me as such. Therefore, a comment did come from a member of Glock’s campaign calling me Islamophobic, and I have beyond reasonable doubt that other similar comments may have been espoused by other members of Glock’s campaign or on her behalf. Any condemnation of language criticizing me by Glock’s campaign feels unsubstantiated and in remorse, given that at least one member of her campaign was engaging in this behaviour.
- I find the defense that Glock’s campaign signed onto a letter condemning bullying and harassment incredibly hypocritical, given that notion that a volunteer on her campaign actively engaged in the very behaviour the letter condemns, and espoused this narrative to students in an attempt to discourage them from voting for me. While I do not hold the Glock campaign accountable for all harassing comments I received online, I have reasonable doubt that there is not at least a correlation between her and Ansari’s campaign activities and these comments, given that a volunteer on her campaign actively engaged in and promoted similar behaviour on campus to students.
- As stated above, I believe Ansari’s actions calling me “Islamophobic” and telling students not to vote for me as such, conducted as a volunteer on behalf of Glock’s campaign, are malicious and substantially prejudicial. They are thus a contravention of Bylaw 320 Sec 17 (4)b and are grounds on their own for Glock’s disqualification.

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.

- It is absolutely the right and responsibility of anyone running in a UASU election to consult with student groups (and other community members or third-parties they believe they should), though I will again note that the above framing of SJP as a student group is factually incorrect.
- It is well established that SJP qualifies as a third-party in this election. Glock's campaign therefore has a responsibility under Bylaw 320 Sec 11 (5) to distance herself from the SJP in the event they conduct campaign activities. New evidence demonstrates that SJP did conduct campaign activity on Glock's behalf and she therefore has a responsibility to distance herself.
 - o The previous ruling found no campaign activity because there was not conclusive evidence if Glock, or Ansari, her volunteer, were involved. This hearing introduces multiple pieces of evidence (two screenshots, CRO witnessing the event, potentially others) that demonstrate Ansari, a volunteer on Glock's campaign, was tabling with other SJP members to tell students who to vote for (and who not to), which constitutes conducting campaign activity.
 - o I have demonstrated above how this campaign activity was explicitly malicious and substantially prejudicial to my campaign.
 - o Glock waited to distance herself from SJP until March 6th, when the Elections Office got involved. The evidence introduced by the Elections Office and I demonstrates that Glock knew SJP would "target" me at least as early as February 22nd. It also demonstrates a close relationship between Glock and Ansari, the latter who evidence suggests is a highly ranking official within the SJP. It can therefore be determined, beyond a balance of probabilities, that Glock was privy to enough information before March 6th, that she had a responsibility under Bylaw 320 Sec 11(1) to act in good faith and inform the CRO, and under Sec 11(5) to distance herself from the SJP. Neither of these actions occurred until March 6th, therefore putting Glock in violation of both aforementioned sections of Bylaw 320.
- Evidence that the Elections Office cites which guided their Ruling #17 contradicts the assertion that Glock only met with SJP once in February. Regardless, her close relationship with a high-ranking officer of SJP and her demonstrated knowledge from the evidence make her guilty of the contraventions of Bylaw 320 listed above.
- I also want to emphasize that the burden of proof outlined in Sec 11 (5) is on the candidate to demonstrate to the CRO that the third-party acted without consent, not on the Elections Office to demonstrate that there was consent. The Elections Office has received significant evidence to demonstrate Glock's awareness of SJP's activities, her close relationship with Ansari, and Ansari's status as a high-ranking officer of the SJP. Glock has provided no additional evidence to demonstrate that SJP acted without her consent. Glock's March 6th statement distancing herself from SJP is moot as the guise that she only became aware of potential contraventions on March 6th has been disproven. Therefore, it can be determined beyond a balance of probabilities that Glock is in contravention of Bylaw 320 Sec 11 (5).

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.

- DIE Board Ruling 2023-02-R has already found that Glock does have an affiliation with SJP. Further, evidence has been submitted demonstrating that Ansari, a volunteer on Glock's campaign, is a high-ranking officer within SJP. This demonstrates a further affiliation.
- I have stated above that it is not a violation for candidates to consult with any students, student groups, or students of particular background. I have no contest with the notion that dozens of student groups have been consulted by candidates in this race. However, it has been established that SJP is not a student group. They qualify as a third-party and Glock is therefore subject to and has violated Bylaw 320 Sec 11 (5) in this instance.

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. [this section refers to the screenshot submitted as evidence of Ansari's story denouncing any student who votes for Griffiths]

- Ansari is a volunteer on Glock's campaign (DIE Board 2023-02-R) not just any student. His story shames and denounces students who exercise their right to vote for me, and spreads misinformation about myself and my campaign (the assertion that I "have done nothing for our student body except take our fees lmao." Ansari's status as a volunteer on Glock's campaign cannot be separated from their actions during the campaign (it is unreasonable to claim that these words were spoken just as a student, but that they are also a volunteer at other times during the campaign).
- Ansari's actions are committed as a volunteer and are therefore on behalf of Glock's campaign. It could be argued that this further contributes to the rhetoric they are espousing that is malicious and substantially prejudicial against me, which is a contravention of Bylaw 320 Sec 17 (4) and is grounds for Glock's disqualification.
- As stated above, I cannot emphasize enough that it is hypocritical, hollow, and unsubstantiated for Glock to leverage the letter that her campaign signed denouncing bullying and negative language against candidates, when her self-proclaimed friend and a campaign volunteer has actively participated in these actions towards me and in a manner that is open and intended to convince students to vote for Glock instead. I feel no sincerity in Glock's campaign denouncing this behaviour towards me, while her friend and at least one member of her campaign is simultaneously committing it.

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. [referring to the section that attests Glock only informed one candidate about her knowledge of the upcoming SJP picks that she knew of].

- While no bylaws require information sharing between candidates, Bylaw 320 Sec 11 (1) requires candidates to act in good faith and Sec 11 (5) governs interaction with third-parties.
- Evidence indicates Glock's awareness that returning candidates, which includes me, would be "targeted" by the SJP. Glock had a responsibility under Sec 11 (1) to report bylaw contraventions to the CRO immediately. The evidence submitted clearly demonstrates Glock was aware of potential contraventions at least as early as February 22nd, yet did not report these to the CRO or distance herself from SJP, making her in contravention of Sec 11 (1) and 11 (5).
- It could be further argued that if Glock was aware that I would be "targeted" to the extent I was (aggressive misinformation and harassment, unfounded labeling and a defamation of character) that she breached her responsibility to act in good faith (contravened Sec 11(1)) by not informing the CRO and me to prevent the fallout that occurred from these actions. Her failure to act in good faith is further emphasized and can be determined beyond a balance of probabilities when it is noted that much of this targeting came at the hands of her friend and campaign volunteer, and the organization with which Glock is affiliated and her friend is a high-ranking official.

Ansari was not involved in the Glock campaign. Glock does not recall calling Ansari 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.

- DIE Board 2023-02-R has already established that Ansari was a volunteer on Glock's campaign. This is supported by the evidence submitted in this appeal and the Elections Office's ruling #17.
- Glock not recalling referring to Ansari as her "secondary campaign manager" and claiming that any similar statement would have been made as a joke is a convenient deflection and unsupported by evidence. I note that when Glock used the word "target" to refer to what actions SJP would take against me she also claimed that "[I] did not mean the word in that way." Glock's pattern of using damning statements, and later claiming she did not, or they were not intended this way, without evidence to support that notion, should be considered. Additionally, Glock's tendency to lie to and deceive the Elections Office should also be considered when evaluating the merits of these claims. I encourage the DIE Board to take both this and Glock's other statement about SJP "targeting" returning candidates at face value unless given a reason to do so otherwise.
- I acknowledge that Ansari was also Glock's personal friend and provided her emotional support. This is affirmed by Glock referring to them as "a shoulder to cry on" in an earlier appeal. This notion, and the evidence submitted, demonstrates a close relationship between Glock and Ansari. As evidence suggests Ansari is a high-ranking officer of SJP, it can be found, beyond a balance of probabilities, that Glock would have had an intricate understanding SJP's activities from her relationship with Ansari (as both a friend and volunteer). If Ansari was a close enough friend to be "a shoulder to cry on" for Glock, it would be unreasonable to conclude that Glock would not at least have a rudimentary

understanding of her friend's position in SJP and therefore the organizations activities, especially on a matter that so closely impacts her and her opportunities. At an earlier appeal, Glock claimed to have no idea what Ansari's position in SJP was or any knowledge of how the organization functions beyond what she learned in allegedly the only time she spoke with them. With a demonstrated close relationship between Glock and Ansari, it can be found beyond a balance of probabilities that this is at least partially untrue.

- While Glock is not responsible for comments made by individual students, she is responsible for comments and actions by her volunteers, including Ansari. I have demonstrated above how this puts Glock in violation of Bylaw 320 Sec 11(1), 11(5), and 17(4).

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. Ansari 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.

- DIE Board 2023-02-R section 14 has already concluded that SJP provided feedback for the creation of this video and Glock therefore does have an affiliation with them, and that Ansari qualifies as a campaign volunteer for Glock.
- The decision to repost Glock's video may have been SJP's alone, but as evidence demonstrates that Ansari was simultaneously Glock's friend, a volunteer for her campaign, a high-ranking officer for SJP, and actively campaigning outwardly about "SJP's picks" for the UASU election, it is unclear whether Glock or her campaign had influence over the reposting of this video. Regardless, I have demonstrated how Glock failed to appropriately distance herself from SJP, thus contravening Bylaw 320 Sec 11 (5).
- While these activities may not constitute bylaw contraventions on their own, they contribute to or establish a foundation for the contraventions outlined elsewhere in this document.

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.

- I have argued above how, with evidence the Elections Office received and the demonstrated depth of Glock and Ansari's relationship, it is clear, beyond a balance of probabilities, that Glock has not admitted to the level of detailed knowledge that she has of SJP and their activities.
 - o Glock also posted an endorsement from Voaklander (evidence submitted) which highlights Voaklander as the "research lead for SJP." This is not a bylaw contravention on it's own, but it does demonstrate how it is increasingly unlikely that Glock knew only one individual in SJP and had no knowledge of the inner workings of the organization.

- Substantial new evidence has been submitted to the Elections Office since they delivered Ruling #6. Additionally, the Elections Office has indicated multiple instances in Ruling #17 where they were misled by Glock, and therefore they have a responsibility to revisit the pretense under which they made Ruling #6.
- Retrying the previous ruling and therefore this case is not in the contravention of the basic principles of justice. On the contrary, neglecting to consider the newly submitted information and re-evaluate the ruling to ensure that it is just, would be a contravention of the basic principles of justice. Further, the UASU Bylaws guide the process on this matter, not the ambiguous “basic principles of justice.”
- Substantive new evidence has been provided and therefore new conclusions can and should be drawn since the previous ruling.

Again, Ansari had no involvement in the Glock campaign. [In relation to evidence the Elections Office received suggesting that Ansari had a heightened role within SJP during the election and corroborating other evidence which guided the Elections Office’s ruling].

- Ansari was a volunteer for Glock’s campaign (DIE Board 2023-02-R).
- Ansari engaged in tabling and campaign activity on behalf of the third-party SJP, while serving as a volunteer on Glock’s campaign. During this campaign activity Ansari engaged in behaviour that was malicious and substantially prejudicial to my campaign and my character.
- I have outlined above how these actions put Glock in contravention of Bylaw 320 Sec 11 (1), 11 (5), and 17 (4).

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. [In relation to an assertion by the Elections Office that Ansari was present with Glock at the Dewey’s results party despite not being on her guest list, and that Ansari introduced himself to others present as the President of the SJP].

- It is not a campaign violation for Ansari to have attended the results party with Glock. This is simply a further demonstration of the close relationship between Glock and Ansari. The commentary about Ansari being absent from Glock’s approved guest list highlights two things:
 - o The guest list requirement indicates that this was a small, intimate event where candidates were encouraged and only had the space to invite their closest friends and campaign volunteers.
 - o Glock not listing Ansari on her guest list further demonstrates that she was not fully transparent to the Elections Office about their relationship and Ansari’s involvement in her campaign.
- In her appeal, Glock did not dispute the claim that Ansari introduced himself to others at Dewey’s as the President of SJP. If this evidence was not accurate, I would have expected Glock to state that when she addressed this section. It can therefore be found, beyond a balance of probabilities, that this claim is credible and Ansari is, at most the President, and at least a high-ranking official, within the SJP. Any later assertion by Glock or Ansari that they

did not introduce themselves in this way, made after Glock's other claims have been disproven, should be considered with this in mind.

- The entirety of SJP's actions can then be called into question because Ansari was a volunteer on Glock's campaign. Glock's knowledge of SJP's activities can also be called into question because it would be unreasonable to think she was not aware of, or even had at least some influence, over the actions of an organization that her friend and campaign volunteer was leading.
- Glock's attestation that she is unaware of what Ansari's position within SJP can be disproven beyond a balance of probabilities. If a close friend is the President of, or a high-ranking official within an organization, it is very unlikely that Glock would not possess knowledge of this, especially when Ansari has demonstrated a tendency to introduce themselves with their title in public spaces, and one where Glock was present. If this is the case, Glock lied before the DIE Board in an earlier appeal to maintain her stance that she was not aware of Ansari's position within SJP.
- I have already highlighted how Ansari and Glock's actions constitute multiple contraventions of Bylaw 320 Sec 11(1), 11(5), and 17(4).

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.

- Glock is affiliated with SJP (DIE Board 2023-02-R).
- Glock's [lack of] knowledge of SJP's inner workings and decision making process can be called into question, beyond a balance of probabilities, because of her relationship with Ansari. This is further explained in my assertions above.
- Glock has not provided evidence that she did not lie or downplay her involvement with the SJP to the Elections Office. The Elections Office on the other hand has indicated that they have evidence to support these claims. I presume the Elections Office's evidence to be legitimate.

As previously stated, Ansari 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 Ansari 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.

- DIE Board 2023-02-R and evidence supplied to the Elections Office have determined that Ansari qualifies as a campaign volunteer for Glock.
- The audio file submitted indicates that Glock was aware that returning candidates (which I am one) would be "targeted" by the SJP. I maintain that framing is important and should be

taken at face value. Ruling #17 indicates that the Elections Office may have additional evidence that Glock was aware of SJP's intentions, though I have not been privy to this evidence.

- I question Glock's awareness of the plans to slander and denounce other candidates and attack my campaign and character. I have shown evidence, including but not limited to her connection with Ansari, that I believe indicates, beyond a balance of probabilities, that Glock may have been aware or sanctioned these actions, which in either case contravenes at least one section of Bylaw 320.
- I have described how there is no merit in Glock's claims that her campaign denounces any slander or personal attacks I have endured during the campaign, particularly because her friend and a volunteer for her campaign was among those espousing the most egregious attacks. That individual has also been proven to have a significant leadership role in the SJP, who many other of these attacks and slander have come from or been associated with.
- I am unsure how Bylaw 320 Sec 13 and 15 pertaining to campaign materials and campaign expenses should be interpreted in this case and if there are any contraventions. I encourage the Elections Office and the DIE board to consider whether the materials that SJP distributed promoting Glock over myself need to be recorded and expensed in light of the findings about Ansari's simultaneous status as Glock's volunteer and a high-ranking officer within SJP, and developments in Glock's understanding of SJP's activities. I respect the conclusions that the Elections Office and DIE Board draw on this matter.
 - o The screenshots submitted depict Ansari tabling and distributing what appears to be SJP branded election materials. Since Ansari is a volunteer on Glock's campaign, there may be potential violations of Bylaw 320 Sec 13 and 15 if these materials were not listed and expensed by Glock's campaign.

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.

- I have demonstrated above how the actions of Glock's campaign constitute bad faith and malicious as outlined in Bylaw 320 Sec 11(1) and 17(4).
- It has been established, through the evidence submitted in this appeal and DIE Board 2023-02-R that Glock is affiliated with the SJP.
- The SJP is not a student group, and thus falls under third-party legislation outlined in Bylaw 320 Sec 11(5). SU Bylaws are more applicable in this case than the Charter of Rights and Freedoms, though I will note that the Charter does not protect individuals' right to espouse hate speech against others.
- I trust that the evidence I have provided, and the evidence the Elections Office has provided, is legitimate and therefore supports the assertions provided in this document.
- Regarding EO 2019 Ruling #5: not all contraventions in Glock's case are related to legislation governing third-parties. Further, this case is unique due to the incredibly thin separation between the third-party and Glock's campaign. In particular, the status of one of Glock's campaign volunteers as a high-ranking official within the third-party. I have established how Bylaw 320 Sec 11(5) governing third-parties was contravened in this case.
- While I respect and acknowledge the importance of grounding our rulings in precedent, both the Elections Office and the DIE Board also reserve the right to make rulings grounded purely in their interpretation of bylaws and regulations, or to deviate from precedent where appropriate.
- The March 12th ruling was delivered by the Elections Office, specifically the DRO, not the CRO. I touched on this earlier when I explained how steps were taken to mitigate the perceived conflict of interest between the CRO and I.
- Glock was elected on the pretense that all bylaws were adhered to and that the integrity of the election was maintained throughout the process, which Ruling #17 and the evidence submitted to DIE Board for this appeal demonstrates was not the case. Had this evidence been available prior to voting or the interim results announcement, the same ruling would have been delivered and Glock would have been removed from tabulation, resulting in a different outcome. Students' right to democratically choose between candidates that appear on the ballot, again rests on the pretense that all bylaws and regulations have been upheld prior to the ballot being tabulated. It is just to retabulate a ballot when evidence demonstrates that a contravention of bylaws took place that should have adjusted what names were available to students on that ballot. I would argue that it is a more dangerous precedent and greater breach of democracy for a candidate to be elected when they contravened several sections of Bylaw 320 during the process, and engaged in malicious and substantially prejudicial behaviour towards another candidate.

Final Comments:

- I have demonstrated above how Glock's campaign is guilty of at least one contravention for each bylaw listed below, if not of multiple counts for each:
 - o Bylaw 320 Section 11 (1)
 - o Bylaw 320 Section 11 (5)
 - o Bylaw 320 Section 17 (4)
- Contraventions of Section 17 (4) are grounds for a candidate's disqualification on their own. Glock's campaign committed at least one, if not multiple contraventions of all three of the above sections of Bylaw 320. This is sufficient grounds for her disqualification to be upheld.
- I have highlighted further sections of Bylaw 320 (13) and (15) that I believe should be explored to ensure there have been no further contraventions, given that evidence demonstrates a volunteer on Glock's campaign distributed (un-recorded and un-expensed) materials intended to tell students who to vote for in the election.
- Among Glock's contraventions of Section 11(1), the most severe has been her tendency to deceive or withhold information from the Elections Office. This should be considered when evaluating, beyond a balance of probabilities, the rest of the evidence and Glock's claims in this case.
- The burden of proof to overturn a ruling on Section 11 (5) is on the candidate (Glock) to demonstrate to the Elections Office that they distanced themselves from the third-party and that the third-party acted without their consent. The Elections Office has cited evidence that Glock contravened Section 11 (5), and Glock's appeal cites no additional evidence to prove that Section 11 (5)ab has been satisfied.
- Many contraventions have been committed by Ansari, Glock's friend and campaign volunteer. These contraventions include, but are not limited to, Ansari engaging in malicious and substantially prejudicial behaviour slandering my campaign and misinforming students that I am "Islamophobic." Glock violated Section 11 (1) by not ensuring the compliance of her volunteer. In her appeal, Glock has not disputed that Ansari is guilty of committing the mentioned actions, only that he is not a campaign volunteer and that she is not affiliated with the SJP. Both Glock's affiliation and Ansari's status as a volunteer have already been ruled on in DIE Board 2023-02-R, and Ansari's actions clearly qualify under the Bylaw 320 definition of a volunteer. Since Glock has not disputed Ansari's actions, they should be taken as truth.
- Glock's appeal introduces no new evidence to disprove the claims made in the Elections Office's ruling. Further, it relies heavily on assertions that DIE Board 2023-02-R has already ruled against. The multiple bylaw contraventions demonstrated in this response and by the Elections Office are more than substantial to uphold Ruling #17.