

## AFFIDAVIT

I, the undersigned, Aaron DONNY-CLARK, domiciled and residing at 4277 rue At-Urbain, appartement 5, in the City and District of Montréal, Québec, H2W 1V6 do solemnly declare and state :

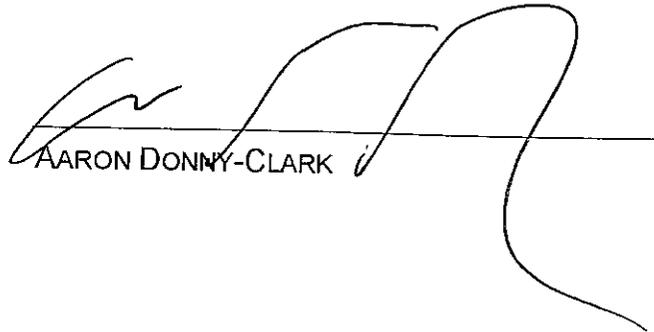
1. I am a Music student at McGill University since 2003;
2. I have been involved in the Québec student movement since 2003;
3. I was on the legislative council of Student Society of McGill University (SSMU) from 2004 to 2007. I occupied the post of Music representative, from 2004 to 2005; Vice-president external from 2005-2006 and President from 2006 to 2007;
4. On June 19<sup>th</sup>, I attended the Special General Meeting (SGM) of the Canadian Federation of Students, Québec element (CFS-Q), where elections were held to elect new Executive Committee of the CFS-Q;
5. Previously to the meeting, I had filed my candidature in accordance with all standing procedures and bylaws. My name had appeared on the list of candidates for the position of National executive representative;
6. The Chief returning officer (CRO), in charge of the elections, Ms. Amanda Aziz, Chairperson of the Canadian Federation of Student – National (CFS-National) decided to hold the elections for the at-large executive in the following order:
  - 1- Chairperson
  - 2- National executive representative
  - 3- Deputy Chairperson
7. A secret vote was held and Ms. Nina Amrov was elected as Chairperson;
8. The CRO asked that the results be ratified;
9. The results of the election for Chairperson were motioned by Concordia Students' Union (CSU) and seconded by Dawson Student Union (DSU);
10. It then came time for the election of National executive representative;
11. Somebody from the Concordia Student Union (CSU) brought up a bylaw that limits the number of members of the at-large executive from any one student union to one. They made the case that because Ms. Amrov is a McGill undergrad (SSMU), this bylaw would therefore exclude the possibility of my election to the post of National executive representative;

12. A discussion then followed in which Ms. Amrov, tried to establish that she would also be a member of the CSU come the fall;
13. After much discussion and several motions, the CRO ruled that for the purpose of the elections at hand, the student union which a delegate belongs to, at the moment of the elections, would be the one considered in the application of this bylaw;
14. My candidature was therefore disqualified;
15. The other candidate, member of the CSU, failed to receive a majority of votes;
16. The election for Deputy Chairperson position followed. Mr. Mahdi Altalibi was elected as Deputy Chairperson by secret ballot;
17. Again, the CRO asked that the results be ratified;
18. The results of the election for Deputy Chairperson were motioned by Student Society of McGill University (SSMU) and seconded by Concordia University Graduate Students' Association (GSA);
19. On August 8<sup>th</sup> 2007, I was with Fehr Marouf and Alexander Winterhalt at the CFS-Q office;
20. We heard some noise in the hallway around 10:00PM;
21. M. Marouf went to the door to look through the peephole and informed us quietly that there were people at the door, including someone whom he recognised as the locksmith;
22. I heard a tool at the door and heard M. Marouf knock at the door and explain that if anyone touches the door, the police would be called;
23. M. Marouf was on his cellphone and informed us that he was contacting M. Altalibi;
24. After a while, I looked out the window and saw M. Altalibi, M. George Soule, Ms. Erika Jabouin and others talking to the police;
25. Later on, it was decided that M. Marouf needed to go down to help M. Altalibi explain to the police officer, but we needed to be careful as he exited;
26. We decided that M. Winterhalt would open the lock and the door and close it quickly when M. Marouf exited;

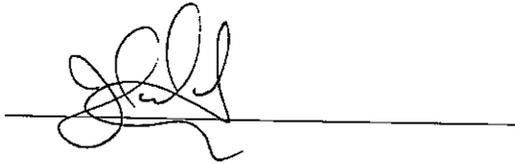
27. I stood behind M. Marouf as he prepared to exit;
28. When the door opened, someone, whose voice I recognised as being M. Noah Stewart-Ornstein, struggled to force his way into the office;
29. At this point, I helped M. Marouf to exit the office by giving him a light shove;
30. As soon as M. Marouf was out of the doorway, M. Winterhalt closed and locked the door and I heard M. Stewart-Ornstein shouting;
31. M. Winterhalt and I remained in the office and watched out the window where I saw M. Marouf, M. Altalibi, M. Stewart-Ornstein, M. Soule, M. Roland Nassim, Ms. Jabouin, and others talking to the police;
32. After a while, M. Altalibi, M. Marouf and others came back up;
33. I left the office shortly after;
34. From my experience in the student movement and to my knowledge, the beginning of this fall semester will be crucial to the struggle for accessible post-secondary education;
35. Given the announced increase in tuition fees beginning this fall, many student unions have already taken strike mandates for the early fall;
36. A failure on the part of the CFS-Q, as the representative of most of the anglophone post-secondary students in Québec, to be ready to work with the rest of the Québec student movement could be detrimental to the overall struggle and would be a de facto failure in the primary mission of the CFS-Q;

All the above facts alleged in this affidavit are true.

And I have signed in Montreal,  
this 6<sup>th</sup> day of September 2007

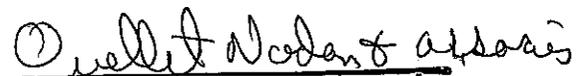
  
AARON DONNY-CLARK

Solemnly declared before me, in  
Montreal, this 6<sup>th</sup> day of September  
2007





**Copie conforme**

  
**QUELLET, NADON & ASSOCIÉS**