

Michelaine Lahaie, Chairperson Civilian Review and Complaints Commission for the RCMP P.O. Box 1722, Station B Ottawa, ON K1P 0B3 Fax: 613-952-8045

July 24, 2023

Dear Ms. Lahaie,

## Re: Systemic Investigation of the RCMP "E" Community-Industry Response Group (C-IRG)

The British Columbia Civil Liberties Association ("BCCLA") welcomes the Chairperson's invitation to submit additional complaints in support of its systemic investigation of the RCMP "E" C-IRG. While we are aware that the *Royal Canadian Mounted Police Act* requires complaints be filed within a year of the alleged conduct, we recognize that the Commission has the discretion to extend the time limit for making a complaint if there are good reasons to do so and it is not contrary to the public interest. We are confident that the conduct of the RCMP members that form the basis of our complaint falls within the scope of the terms of reference for the systemic investigation that was announced on March 9, 2023<sup>1</sup>.

Access to justice demands that there must be a way to check the RCMP's oppressive conduct other than going to court. It is in that spirit that we wish to share the interaction BCCLA Staff Counsel, Veronica Martisius, had with two members of the RCMP C-IRG, officers Brady and A. Blakeman, at an exclusion zone checkpoint within the Fairy Creek/Tree Farm License 46 ("TFL 46") area on unceded Ditidaht territory. We hope that it will provide valuable insight for the purposes of your investigation.

## Fairy Creek Context

In April 2021, Justice Verhoeven of the BC Supreme Court granted Teal Cedar's application for an injunction order (the "Injunction") against interference with its logging operations within the traditional and unceded territories of the Pacheedaht and Ditidaht peoples on southern Vancouver Island. The boundaries of the injunction area covered TFL 46, a large swath of land including the Fairy Creek watershed, Central Walbran, and the Caycuse Valley. The BC government granted Teal Cedar permits to cut timber and to conduct road building within certain parts of TFL 46. This area contains stands of ancient old growth forest, which Indigenous land defenders, environmental activists and protesters have been actively trying to protect since August 2020.

In addition to prohibiting interference with logging activity, the Injunction explicitly prohibited "anyone having knowledge of the Court's order" from interfering with any person, including any member of the public, from using any road to access or exit the injunction area. The Injunction also stipulated that the defendants and other persons were free to participate in a peaceful, lawful and safe protest. The RCMP

<sup>&</sup>lt;sup>1</sup> Civilian Review Complaints Commission for the RCMP: Systemic Investigation of the RCMP "E" Division Community-Industry Response Group (C-IRG) (March 9, 2023), online: <u>https://www.crcc-ccetp.gc.ca/en/crcc-systemic-investigation-rcmp-e-division-community-Industry-Response-Group</u>.

was empowered by the Injunction to arrest and remove persons contravening its terms, but the Injunction did not authorize the RCMP to take preventative measures against persons who might contravene the Injunction, including the use of exclusion zones and/or access control points for that purpose.

#### Attached and marked as Appendix A is a true copy of Justice Verhoeven's order dated April 1, 2021.

#### Complaint

Between June 7 and 8, 2021, Veronica was in the Caycuse Valley in Ditidaht territory upon invitation by Indigenous land defenders. At that time, active logging was occurring in the area. On June 8, she was travelling along Caycuse Main Road towards Lake Cowichan and came across an RCMP truck marked "CIRG05" that was parked across the road. When she approached the truck, she stopped her vehicle, and an officer asked her if she was heading home to which she replied "yes". The officer backed up the truck and she was able to exit the injunction area without incident. Shortly thereafter, she observed three vehicles heading toward the checkpoint she had just passed through, so she turned her vehicle around and proceeded to follow the vehicles. At approximately 1:50 pm, she parked her vehicle on the side of the road and approached RCMP officers Brady and A. Blakeman to ask them some questions.

# Attached and marked as Appendix B is "a YouTube link" to a true video recording of Veronica's interaction with officers Brady and A. Blakeman on June 8, 2021.

The following is a summary of what officers Brady and A. Blakeman said to Veronica and the six other members of the public who were present:

- No one could pass, even though the Caycuse Main Road is a <u>public road</u> and Veronica had just exited the injunction area.
- The reason Veronica and others could not pass through was because it was where the exclusion zone started.
- When Veronica asked about the officers' authority for establishing the exclusion zone, Brady stated that it was the Injunction itself. Veronica replied, "no, it isn't" and presented a copy of the Injunction she had on her person. At no time did the officers present a copy of or read the Injunction.
- When Veronica asked if the officers had the authority under the common law, Brady replied "that too" but did not elaborate or point to a particular decision.
- Brady stated that the exclusion zone was "temporary" and had been there since Monday June 7, 2021.
- Brady stated that the exclusion zone allows the RCMP to enforce the injunction in an area that is "safe for us to do so".
- Brady said that if anyone tried to pass through, they would be arrested for obstruction of a peace officer, s. 129 of the *Criminal Code*.
- The officers told Veronica and the others that they could take up their concerns about the exclusion zone with the courts or contact the RCMP Media Relations Officer, Sgt Chris Manseau, or their superior whose name they claimed not to know.

Brady and A. Blakeman were not able to provide any information either verbally or in writing about their authority to establish and enforce the exclusion zone. They did not ask for any identifying information from Veronica or the others but during the interaction (and without their consent) Officer Brady started to document their license plate information. When Veronica questioned him about what he was doing, he stated that he wanted to know he was "dealing with". This was a prima facie violation of their privacy rights and of provincial policing standards. The BC Provincial Policing Standards explicitly state that "officers are not permitted to request or demand, collect, or record a person's identifying information without a justifiable reason that is consistent with existing legal authorities and narrowly, not broadly, defined limitations granted to officers."<sup>2</sup>

Because Brady claimed that this checkpoint and exclusion zone was connected to enforcement of the injunction order and Veronica was aware that on that same afternoon, active enforcement was happening at the Hayhaka camp several kilometers away, she followed-up with Sgt Chris Manseau via email on June 10, 2021. RCMP Counsel, Bobby Bharaj, responded to her and stated:

The temporary exclusion zone you note was created as the RCMP were carrying out active enforcement in the area. The temporary exclusion zone in question extended from the intersection of Gordon River Main and Braden Main to the intersection of Gordon River Main and Truck Road 11. This confined the temporary exclusion zone to the smallest area required to create a safe working zone for police to carry out their lawful duties while allowing public access to the injunction area.

Unfortunately, I am not aware of the email you are referring to, but the RCMP members are generally advised to inform the public that a temporary exclusion zone is in place as enforcement actions are being conducted.

When I pointed out that Caycus Main is located on the other side of the injunction area, Bharaj stated:

I've looked into the issues you raised and my understanding is that what you encountered was an access control point established to allow the RCMP to be *accountable for public safety and control access into an area where active logging operations were taking place.* [emphasis added]

Attached and marked as Appendix C is a true copy of the email exchange between Veronica Martisius and Bobby Bharaj dated June 17, 2021.

An access control point to allow the RCMP to be accountable for public safety and control access in relation to active logging is a marked departure from the explanation that Officer Brady provided in stopping Veronica and the others. Based on Veronica's direct observations and the information she obtained from Bobby Bharaj, the RCMP appeared to be blocking Caycuse Main for the sole benefit of

<sup>&</sup>lt;sup>2</sup> British Columbia, Provincial Policing Standards: Police Stops (15 January 2020), online: <<u>https://www2.gov.bc.ca/assets/gov/law-crime-and-justice/criminal-justice/police/standards/6-2-1-police-stops.pdf</u>>

Teal Cedar. In other words, the RCMP appeared to be inhibiting the rights of Veronica and others to use the road in order to prevent people from getting anywhere near "active logging operations", a tactic that is neither contemplated by, or authorized by the Injunction. In fact, we submit that the RCMP's actions were actually in breach of the Injunction itself.

#### **RCMP Exclusion Zones Violated the Injunction Order**

Although the Injunction stipulated that the RCMP retained discretion as to the timing and manner of enforcement, there was no clause that stated that the RCMP is exempt from item 1(a) of the Injunction, which stated:

- 1. An interlocutory injunction lasting until midnight on September 26, 2021 is granted requiring that the Defendants (by themselves, and for their officers, members, servants, agents, representatives) and <u>anyone having knowledge</u> of the Court's order, are restrained, enjoined and prohibited from:
- (a) Impeding, physically obstructing, or in any way interfering with any person, including any member of the public, from gaining access to or egress from, or otherwise making use of any road, road construction site or planned road construction site ("the Roads") situate within the [Injunction Area]

The RCMP, having knowledge of the terms of the Injunction, willfully contravened section 1(a) of the Injunction by implementing exclusion zones that prohibited members of the public from entering the injunction area. The RCMP is not above the law; it must act within the bounds of what is authorized by law. In this case, the Injunction did not expressly give the RCMP the power to implement exclusion zones in order to enforce the Injunction.

In a different case, *International Forest Products Limited v. Kern et al*, 2000 BCSC 888, the court referred to an injunction order made by Wong J that included a similar term prohibiting the defendants and anyone else having knowledge of the order from placing themselves, or any other person or vehicle, at any time (24/7) within a 50-metre radius exclusion zone around a specific area. However, this order expressly stated that the term did not apply to the RCMP to assist in the enforcement of the order.<sup>3</sup>

If item 1(a) of the Injunction was not supposed to apply to the RCMP, it is reasonable to expect that Justice Verhoeven should have added a similar exception clause. Consequently, the RCMP C-IRG'suse of checkpoints and exclusion zones was a clear breach of the Inunction.

## Violations of Civil Liberties, Human and Indigenous Rights

In addition to violating the Injunction itself, the implementation of exclusion zones on unceded Pacheedaht and Ditidaht lands – what Canada and BC refer to as "Crown" land – constitutes a perverse misuse of police authority and a serious and unjustifiable breach of the *Charter of Rights and Freedoms* and *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP), which legally applies in BC

<sup>&</sup>lt;sup>3</sup> International Forest Products Limited v. Kern et al, 2000 BCSC 888 at para 17.

through its *Declaration on the Rights of Indigenous Peoples Act* (DRIPA). In this context, the RCMP, C-IRG's use of checkpoints and exclusion zones violate the following *Charter* rights:

- Section 2(b): Freedom of expression including freedom of the press and other media communications
- Section 2(c): Freedom of peaceful assembly (including freedom of movement)
- Section 2(d): Freedom of association
- Section 7: The right to life, liberty and security of the person and the right not to be deprived thereof except in accordance with the principles of fundamental justice
- Section 8: The right to be secure against unreasonable search and seizure
- Section 9: The right to be free from arbitrary detention

And UNDRIP/DRIPA:

- Article 26: Indigenous peoples have the right to the lands, territories and resources, which they have traditionally owned, occupied or have otherwise used or acquired
- Article 29: Indigenous peoples have the right to conservation and protection of the environment and the productive capacity of their lands or territories and resources.

All these rights are set out in written laws that are publicly accessible. This stands in stark contrast to the justification Brady plucked from the air to explain the exclusion zone. It is deeply unjust and undemocratic for individuals who are intimately aware of their rights to be denied those rights by RCMP officers who are clearly ignorant about the law as it stands yet wield tremendous power and potential for violence in enforcing their interpretation of the law.

## Broad and Arbitrary Exclusion Zones Are Not Authorized at Common Law

This situation is alarmingly reminiscent of what occurred in Wet'suwet'en territories. The CRCC informed the BCCLA that it would not be investigating that matter because it had already provided extensive guidance to the RCMP, by way of the interim findings and recommendations made in the Kent County Report. In the CRCC's response to the BCCLA, you noted:

[C]ase law provides that police have the power to create "buffer zones" for specific, well-defined purposes, but that this is not a general power and instead must be temporarily, geographically, and logistically responsive to the situation.<sup>4</sup>

The Kent County Report does not refer to a single specific decision where the court authorized the police to implement "buffer zones" or exclusion zones in the inconsistent and arbitrary manner that the RCMP C-IRG did at Fairy Creek.

Police actions that interfere with individual liberty are only permitted at common law if the police can prove that they are ancillary to the fulfillment of recognized police duties. With that said, the ancillary

<sup>&</sup>lt;sup>4</sup> Letter from CRCC Chairperson, Michelaine Lehaie to BCCLA et al (13 February 2020), BCCLA, online: <<u>https://bccla.org/wp-content/uploads/2020/02/Correspondence-CRCC-Chairperson-2020-02-13-Highlighted.pdf</u>>

powers doctrine does not give police *carte blanche* to do whatever they think is necessary to fulfill their duties. The Supreme Court of Canada has consistently interpreted these common law policing powers under a strict test set out in *R v. Waterfield*<sup>5</sup> and with the onus always resting on the state.<sup>6</sup> In *Fleming*, the Court stated, "[a]n intrusion of liberty should be a measure of last resort, not a first option. To conclude otherwise would be generally to sanction actions that infringe the freedom of individuals significantly as long as they are effective. That is a recipe for a police state not a free and democratic society."<sup>7</sup>

On that important note, the BCCLA applauded the BC Supreme Court's decision in *Teal Cedar Products Ltd. v. Rainforest Flying Squad*, 2021 BCSC 1903. After careful consideration, Justice Thompson exercised his discretion against extending the injunction stating that the methods of enforcement of the Court's order and the conduct of the RCMP led to "serious and substantial infringement of civil liberties", including "impairment of the freedom of the press to a marked degree". Justice Thompson concluded that an important feature of the injunction was to maintain public access to the roads in the injunction area. He also found that the RCMP's broad exclusion zones, and associated checkpoints and searches, were unlawful because they were not reasonably necessary to carry out their duties.

#### Conclusion

We are pleased that the CRCC took up a systemic investigation as it is a matter of significant public interest and importance. Since the release of the Kent County Report and its recommendations, the RCMP continues to act in a manner that is arbitrary and unlawful, threatens democratic participation and evades public and judicial scrutiny. The RCMP must be held accountable – not empowered to 'stick to its guns' when it comes to denying individual liberties. The implementation of unlawful exclusion zones on unceded First Nations lands and the violent suppression of Indigenous rights to defend the land and those who join in peacefully protest must come to an end.

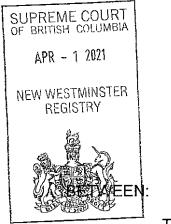
<sup>&</sup>lt;sup>5</sup> *R v. Waterfield*, [1963] 3 A11 E.R. 659.

<sup>&</sup>lt;sup>6</sup> Dedman v The Queen, [1985] 2 S.C.R; *Cloutier v Langlois*, [1990] 1 S.C.R. 158; *R v Godoy*, [1990] 1 S.C.R. 311; *R v Mann*, 2004 SCC 52; *R v Kang-Brown*, 2008 SCC 18; *R v MacDonald*, 2014 SCC 3; and *R v Fleming*, 2019 SCC 45 (*"Fleming"*).

<sup>&</sup>lt;sup>7</sup> Fleming at para 98.

# Appendix A

Justice Verhoeven's Injunction Order dated April 1, 2021



No. S211602 Vancouver Registry

# IN THE SUPREME COURT OF BRITISH COLUMBIA

#### TEAL CEDAR PRODUCTS LTD.

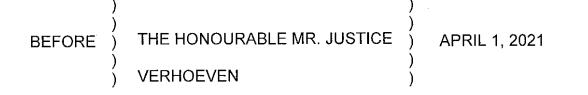
PLAINTIFF

AND:

KATHLEEN CODE, CAROLE TOOTILL AND WILLIAM JONES, IN THEIR CAPACITY AS MEMBERS OF THE "RAINFOREST FLYING SQUAD", UNKNOWN PERSONS OPERATING AS THE "RAINFOREST FLYING SQUAD", ROBERT ARBESS (ALSO KNOWN AS REUBEN GARBANZO), JOHN DOE, JANE DOE, AND PERSONS UNKNOWN

#### DEFENDANTS

#### ORDER MADE AFTER APPLICATION



ON THE APPLICATION of the plaintiff, Teal Cedar Products Ltd. coming on for hearing by telephone (800 Smithe Street, Vancouver, BC V6Z 2E1) on March 25 and 26, 2021 and on hearing Dean Dalke, counsel for the plaintiff and Philip R. Dwyer, counsel for the defendants, Kathleen Code, Carole Tootill and William Jones in their capacity as members of the "Rainforest Flying Squad":

#### THIS COURT ORDERS that:

1. An interlocutory injunction lasting until midnight on September 26, 2021 is granted requiring that the Defendants (by themselves, and for their officers, members, servants, agents, representatives) and anyone having knowledge of the Court's order, are restrained, enjoined and prohibited from:

impeding, physically obstructing, or in any way interfering with any person, including any member of the public, from gaining access to or egress from, or otherwise making use of any road, road construction site or planned road construction site (the "**Roads**") situate within the area bordered by (i) the E&N Railway Land Grant Boundary to the east, (ii) the San Juan River and the Pacific Rim National Park boundary to the south, (iii) the boundary of the Carmanah Walbran Provincial Park to the west, and (iv) the Nitinaht River and Nitinaht Lake to the north, as indicated on the map attached for illustrative purposes as Schedule A (the "**Injunction Area**");

- (b) obstructing, impeding, or otherwise interfering with the safe passage of motor vehicles, equipment or machinery belonging to the Plaintiff, its employees, agents, contractors or suppliers (the "Motor Vehicles"), and in particular, not to come within 50 metres of the Motor Vehicles in the Injunction Area;
- (c) obstructing, impeding or otherwise interfering with any construction activities conducted on the Roads by the Plaintiff, its employees, agents, contractors or suppliers;
- (d) obstructing, impeding, or otherwise interfering with timber harvesting activities in the Injunction Area by the Plaintiff, its employees, agents, contractors or suppliers;
- threatening, harassing, intimidating, assaulting, physically obstructing, or physically interfering with the Plaintiff's employees, agents, contractors or suppliers or their families;
- 2. An order lasting until midnight on September 26, 2021 is granted:
  - (a) authorizing any police officer with the Royal Canadian Mounted Police, and/or the appropriate police authority in the jurisdiction in question (the "Police"), to arrest and remove any person who has knowledge of this Order and who the Police have reasonable and probable grounds to believe is contravening or has contravened any provision of this Order;

(a)

- (b) that the Police retain discretion as to the timing and manner of enforcement of this Order, and specifically retain discretion as to the timing and manner of arrest and removal of any person pursuant to this Order;
- (c) that the Police retain discretion to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening or has contravened any provisions of this Order, upon that person agreeing in writing to abide by this Order;
- (d) authorizing any peace officer and any member of the Police who arrests or arrests and removes any person pursuant to this Order to:
  - release that person from arrest upon that person agreeing in writing to obey this Order;
  - (ii) release that person from arrest upon that person agreeing in writing to obey this Order and require that person to appear before this Court at such place as may be directed by this Court, on a date to be fixed by this Court;
  - (iii) bring that person forthwith before this Court at any location where the Court may sit;
  - (iv) detain that person in custody until such time as it is possible to bring that person before this Court; and/or,
  - (v) otherwise take steps in accordance with Part XVI of the Criminal Code, R.S.C. 1985, c. C-46.
- 3. Provided the terms of this Order are complied with, the Defendants and other persons are free to participate in a peaceful, lawful and safe protest.
- 4. Any person affected by the court's order, including the Plaintiff, is at liberty to apply to the Court to set aside or vary this Order on two business days' notice.

- 5. The Plaintiff shall abide by any order that this Court may make as to damages as a result of obtaining injunctive relief.
- 6. The Defendants' approval as to the form of this Court's order is dispensed with.
- 7. The Defendants shall pay costs of this application to the Plaintiff in any event of the cause, payable forthwith and within 60 days from the date of this Order.

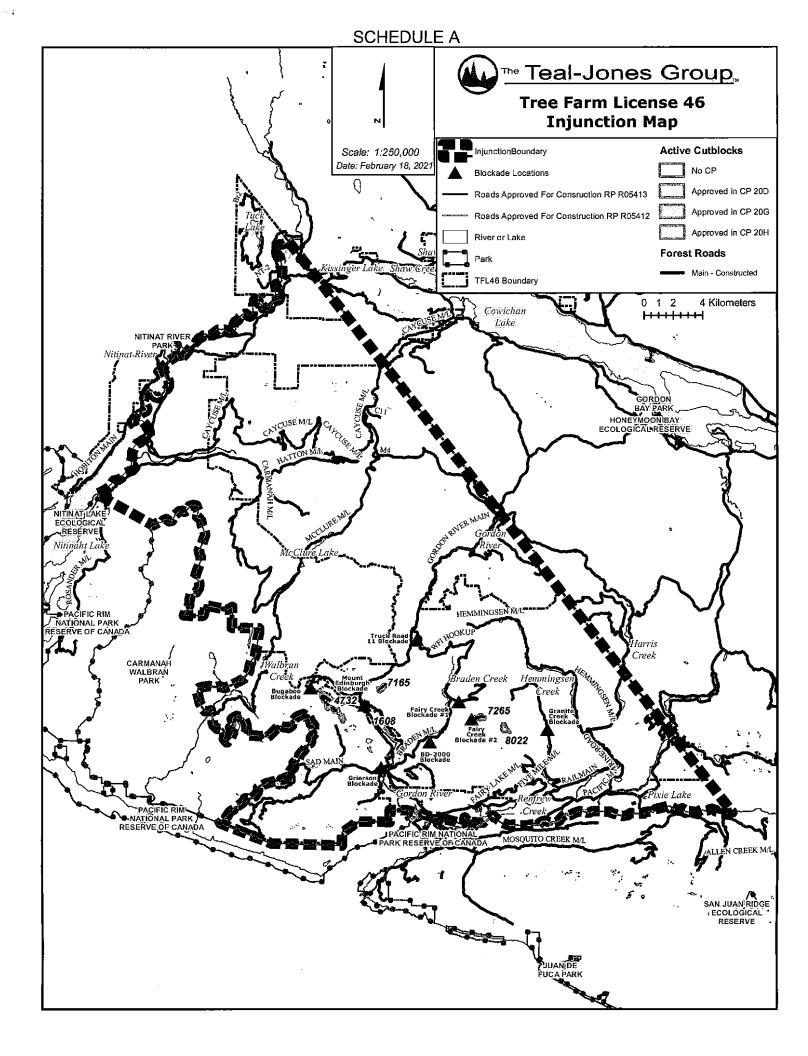
8. This order May be entered at the New Westminister registry. THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

1

Signature of lawyer for the plaintiff DLA Piper (Canada) LLP (Dean Dalke)

BY THE CO REGISTR





No. S211602 Vancouver Registry

#### IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

#### TEAL CEDAR PRODUCTS LTD.

#### PLAINTIFF

AND:

KATHLEEN CODE, CAROLE TOOTILL AND WILLIAM JONES, IN THÈIR CAPACITY AS MEMBERS OF THE "RAINFOREST FLYING SQUAD", UNKNOWN PERSONS OPERATING AS THE "RAINFOREST FLYING SQUAD", ROBERT ARBESS (ALSO KNOWN AS REUBEN GARBANZO), JOHN DOE, JANE DOE, AND PERSONS UNKNOWN

DEFENDANT

#### ORDER MADE AFTER APPLICATION

DLA Piper (Canada) LLP Barristers & Solicitors 2800 Park Place 666 Burrard Street Vancouver, BC V6C 2Z7

Tel. No. 604.687.9444 Fax No. 604.687.1612

File No.: 077728-00050

AYH/mkk

# Appendix B

Video of Interaction between Veronica Martisius and RCMP officers Brady and A. Blakeman filmed by Veronica on June 8, 2021

YouTube: https://www.youtube.com/watch?v=HMwTkxsxlL0

# Appendix C

Email exchange between Veronica Martisius and Bobby Bharaj dated June 17, 2021.

# Veronica Martisius

From:	Bharaj, Bobby <bobby.bharaj@justice.gc.ca></bobby.bharaj@justice.gc.ca>
Sent:	Thursday, June 17, 2021 2:07 PM
То:	Veronica Martisius
Subject:	RE: RCMP Exclusion Zone - June 8, 2021

Dear Ms. Martisius:

Thank you for the clarification. I've looked into the issues you raised and my understanding is that what you encountered was an access control point established to allow the RCMP to be accountable for public safety and control access into an area where active logging operations were taking place.

I believe the officer you are referring to is S/Sgt. Charney.

Sincerely,

Bobby Bharaj

Counsel, RCMP Legal Services Department of Justice Canada / Government of Canada <u>bobby.bharaj@justice.gc.ca</u> / Tel: 604-803-8530 Pronouns: he/him/his

Avocat, Services juridiques de la GRC Ministère de la Justice Canada / Gouvernement du Canada <u>bobby.bharaj@justice.qc.ca</u> / Tél: 604-803-8530

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From: Veronica Martisius <veronica@bccla.org>
Sent: Friday, June 11, 2021 4:55 PM
To: Bharaj, Bobby <Bobby.Bharaj@justice.gc.ca>
Subject: RE: RCMP Exclusion Zone - June 8, 2021

#### Hi Bobby,

Thanks for the reply, however, that was not the exclusion zone I noted. I noted an "exclusion zone" on Caycuse Main near Lake Cowichan which was being enforced by Officers Brady and A. Blakeman on June 8, 2021 at approximately 1:50pm. Also, the email or document I was referring to was read by Staff Sgt Charn (sp?) on another occasion on or about May 25, 2021. In that video a number of officers including the Staff Stg and Brady confront an individual about his car being parked in a temporary exclusion zone. The Staff Sgt pulls out of piece of paper and reads from it saying that that the temporary exclusion zone is authorized by "common law". If you can confirm the name of the Staff Sgt that would be great.

Thanks, Veronica

From: Bharaj, Bobby <Bobby.Bharaj@justice.gc.ca>
Sent: Friday, June 11, 2021 4:24 PM
To: Veronica Martisius <veronica@bccla.org>
Subject: RE: RCMP Exclusion Zone - June 8, 2021

Dear. Ms. Martisius:

The temporary exclusion zone you note was created as the RCMP were carrying out active enforcement in the area. The temporary exclusion zone in question extended from the intersection of Gordon River Main and Braden Main to the intersection of Gordon River Main and Truck Road 11. This confined the temporary exclusion zone to the smallest area required to create a safe working zone for police to carry out their lawful duties while allowing public access to the Injunction Area.

Unfortunately, I am not aware of the email you are referring to, but the RCMP members are generally advised to inform the public that a temporary exclusion zone is in place as enforcement actions are being conducted.

Please feel free to contact me if you have further questions about RCMP actions.

Bobby Bharaj

Counsel, RCMP Legal Services Department of Justice Canada / Government of Canada <u>bobby.bharaj@justice.gc.ca</u> / Tel: 604-803-8530 Pronouns: he/him/his

Avocat, Services juridiques de la GRC Ministère de la Justice Canada / Gouvernement du Canada <u>bobby.bharaj@justice.gc.ca</u> / Tél: 604-803-8530

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From: Veronica Martisius Sent: Thursday, June 10, 2021 2:08 PM To: <u>chris.manseau@rcmp-grc.gc.ca</u> Subject: RCMP Exclusion Zone - June 8, 2021 Good afternoon Cpl Manseau,

On Tuesday June 8, 2021 at approximately 1:50 pm, two RCMP officers (Brady and A. Blakeman) had their truck (CIRG05) parked on Caycuse Main near Lake Cowichan. They were blocking the road and said it was an "exclusionary zone" that is authorized by the injunction. Can you please tell me what the radius of this particular exclusion zone was? Or were they just blocking traffic/people (other than Teal Jones workers) from entering into the injunction area?

Also can you please provide me with a copy of the email that RCMP officers are reading to people about the temporary exclusion zone? I believe this is an email from a superior?

Thank you for your cooperation in this regard, Veronica

#### Veronica Martisius

she/her/hers Staff Counsel (Policy) | BC Civil Liberties Association Email: veronica@bccla.org

306 – 268 Keefer Street Vancouver, BC V6A 1X5 www.bccla.org

Sent from the ancestral and unceded lands of the xʷməθkʷəỷəm (Musqueam), S<u>kwx</u>wú7mesh (Squamish) & səliİwətaઋ (Tsleil-Waututh)

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