

Court File No.

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

THE ATTORNEY GENERAL OF ONTARIO

Applicant

and

JOHN DOE, JANE DOE, LOGAN DOE and PERSONS UNKNOWN
ORGANIZED OR PARTICIPATING IN THE AL-QUDS COMMITTEE, THE
PALESTINIAN YOUTH MOVEMENT, LEBANESE4PALESTINE and
SAMIDOUN

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

**APPLICATION RECORD OF THE APPLICANT, THE ATTORNEY
GENERAL OF ONTARIO**

March 14, 2026

LENCZNER SLAGHT LLP

Barristers

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**LAWYERS FOR THE ATTORNEY
GENERAL OF ONTARIO**

TO: **JOHN DOE**

Respondent

AND TO: **JANE DOE**

Respondent

AND TO: **LOGAN DOE**

Respondent

AND TO: **PERSONS UNKNOWN ORGANIZED OR PARTICIPATING IN THE AL-
QUDS COMMITTEE, THE PALESTINIAN YOUTH MOVEMENT,
LEBANESE4PALESTINE and SAMIDOUN**

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SUPERIOR COURT OF JUSTICE**

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(Court Seal)

THE ATTORNEY GENERAL OF ONTARIO

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ORGANIZED OR PARTICIPATING IN THE AL-QUDS COMMITTEE, THE
PALESTINIAN YOUTH MOVEMENT, LEBANESE4PALESTINE and
SAMIDOUN

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

**NOTICE OF APPLICATION IN THE MATTER OF AN INTENDED
PROCEEDING**

TO THE RESPONDENTS

A LEGAL PROCEEDING HAS BEEN COMMENCED by the Applicant. The claim made by the Applicant appears on the following page.

THIS APPLICATION will come on for a hearing in person, on Saturday March 14, 2026 at a time to be set by the Court, on a Zoom link to be provided.

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the application, you or an Ontario lawyer acting for you must forthwith prepare a notice of appearance in Form 38A prescribed by the *Rules of Civil Procedure*, serve it on the Applicant's lawyer or, where the Applicant does not have a lawyer, serve it on the Applicant, and file it, with proof of service, in this court office, and you or your lawyer must appear at the hearing.

IF YOU WISH TO PRESENT AFFIDAVIT OR OTHER DOCUMENTARY EVIDENCE TO THE COURT OR TO EXAMINE OR CROSS-EXAMINE WITNESSES ON THE APPLICATION, you or your lawyer must, in addition to serving your notice of appearance, serve a copy of the evidence on the Applicant's lawyer or, where the Applicant does not have a

lawyer, serve it on the Applicant, and file it, with proof of service, in the court office where the application is to be heard as soon as possible, but at least four days before the hearing.

IF YOU FAIL TO APPEAR AT THE HEARING, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO OPPOSE THIS APPLICATION BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

Date _____ Issued by _____
Local Registrar

Address of court office: Superior Court of Justice
330 University Avenue
Toronto ON M5G 1R7

- TO: **JOHN DOE**
- AND TO: **JANE DOE**
- AND TO: **LOGAN DOE**
- AND TO: **PERSONS UNKNOWN ORGANIZED OR PARTICIPATING IN THE AL-QUDS COMMITTEE**
- AND TO: **THE PALESTINIAN YOUTH MOVEMENT**
- AND TO: **LEBANESE4PALESTINE**
- AND TO: **SAMIDOUN**

APPLICATION

1. The Applicant, the Attorney General of Ontario, makes application for:
 - (a) An interlocutory and permanent injunction that the Respondents and each of them and all persons having knowledge of the Order, shall be restrained and enjoined from directly or indirectly, by any means whatsoever, engaging in an Al-Quds Day protest in the City of Toronto, on March 14, 2026, or on any other day.
 - (b) In the alternative, an interlocutory and permanent injunction that the Respondents and each of them and any and all persons having knowledge of the Order, shall be restrained and enjoined from directly or indirectly, by any means whatsoever, while engaging in an Al-Quds Day protest in the City of Toronto, on March 14, 2026, or on any other day, from:
 - (i) watching, besetting or picketing, physically preventing, impeding, restricting or in any way physically interfering with, or counselling others to watch, beset or picket, impede, restrict or in any way physically interfere with access to the United States Consulate General located at 360 University Avenue, Toronto, Ontario;
 - (ii) damaging or destroying any property, utilities, or other infrastructure at the United States Consulate General;
 - (iii) physically preventing, impeding, restricting or in any way physically interfering with, or counselling others to impede, restrict or in any way physically interfere with access to residences, commercial premises,

businesses, or other property in the City of Toronto, including the Mount Sinai Hospital, Toronto General Hospital, or the Hospital for Sick Children,;

- (iv) causing or attempting to create a public nuisance within 100 meters of the locations listed in paragraphs (i) and (ii) above;
 - (v) engaging in or attempting to engage in speech that constitutes hate speech under the *Canadian Charter of Rights and Freedoms*;
 - (vi) engaging in or attempting to engage in violence;
 - (vii) engaging in unlawful assembly, mischief, intimidation rioting, nuisance, or the creation of a disturbance within the meaning of sections 63, 64, 175, 180, 423, and 430 of the *Criminal Code*.
- (c) In the further alternative, an interlocutory and permanent injunction that the Respondents and each of them and all persons having knowledge of the Order, shall be restrained and enjoined from directly or indirectly, by any means whatsoever:
- (i) engaging in or attempting to engage in speech that constitutes hate speech under the Canadian Charter of Rights and Freedoms;
 - (ii) engaging in or attempting to engage in violence;

- (iii) engaging in unlawful assembly, mischief, intimidation rioting, nuisance, or the creation of a disturbance within the meaning of sections 63, 64, 175, 180, 423, and 430 of the Criminal Code; or
- (iv) engaging in conduct that breaches any lawful direction of the Toronto Police Service.

while engaging in an Al-Quds Day protest in the City of Toronto, on March 14, 2026, or on any other day,

- (d) An Order authorizing the Toronto Police Service, the Ontario Provincial Police, and any other police authority (the “Police”), to arrest and remove persons, objects and structures who the Police have reasonable and probable grounds to believe is contravening or has contravened any provision of this Order.
- (e) An Order authorizing the Police or designated agents shall have authorization to remove any vehicles, personal property, equipment, structures, or other objects that impede or block access to public roadways in the City of Toronto.
- (f) An Order that the Police shall retain discretion as to the timing and manner of enforcement of this Order, and specifically retain discretion:
 - (i) as to the timing and manner of arrest and removal of any person pursuant to this Order;
 - (ii) to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening, or has

contravened, any provision of this Order, upon that person agreeing to abide by this Order; and

- (iii) to lay any charges or take any other lawful action.
- (g) An Order that any member of the Police who arrests or arrests and removes any person pursuant to this Order shall have authorization to release that person from arrest upon that person agreeing in writing to obey this Order.
- (h) An Order that notice of this Order shall be given by the creation of a URL whereby this Order can be viewed and downloaded, with the Attorney General of Ontario issuing press releases containing the URL linking to the Order.
- (i) An Order that notice of this Order may be given in the following manners:
 - (i) by posting copies of this Order in or around the City of Toronto;
 - (ii) by reading the Order to any person, including but not limited to reading the Order over an amplification system;
 - (iii) by publishing this Order online; and
 - (iv) any other manner deemed appropriate by the Applicant or the Toronto Police Service.
- (j) An Order issuing the Notice of Application and abridging the time for service or dispensing with service of the Notice of Application and the materials filed in support of the application, as the case may be.

(k) Such further and other Relief as this Honourable Court may deem just.

2. The grounds for the application are:

- (a) The 2026 Al-Quds Day Rally (the “Rally”) in Toronto is scheduled to take place on Saturday, March 14, 2026 at 3:00 p.m. at various locations in the downtown core, including on a route including Queen Street, University Avenue, Dundas Street, and Bay Street, including in the vicinity of the United States Consulate General Toronto, located at 360 University Avenue;
- (b) John Doe, Jane Doe, Logan Doe, and Persons Unknown represent people who plan or intend to attend the Rally;
- (c) The Rally has been promoted online by groups communicating under the names “Al-Quds Toronto”, “Palestinian Youth Movement”, “Lebanese4Palestine”, and “Samidoun”;
- (d) Over the past two plus years and escalating over the last two weeks, the Greater Toronto Area has seen multiple incidents of serious violence, including gunfire, including incidents directed Jewish school and Jewish-owned businesses, at synagogues and Iranian-Canadians who are opposed to the current Iranian regime;
- (e) Incidents of violence have escalated in the past few days across North America, including in an attack against a Jewish place of worship in the State of Michigan;
- (f) On March 1, 2026, a boxing gym associated with the Iranian-Canadian activist Salar Gholami was targeted in a shooting in Thornhill, Ontario. Mr. Gholami and

the gym had been associated with public anti-Iranian regime demonstrations, and Mr. Gholami is a known critic of the government of Iran;

- (g) Between March 2 and March 7, 2026, three separate incidents occurred in which gunshots were fired at three different synagogues in the Greater Toronto Area;
- (h) On March 10, 2026, multiple gunshots were fired in the early morning hours by two assailants standing on the road in front of the U.S. Consulate General Toronto, located at 360 University Avenue in Toronto;
- (i) On March 13, 2026 Samidoun (also known as the Palestinian Prisoner Solidarity Network), an organization listed as terrorist entity under the *Criminal Code*, issued a call to action urging "mass mobilization and protest, direct actions and confronting the Zionist and imperialist war machine everywhere" and "Every one of the missiles targeting U.S. bases and the center of imperialism in the region, the Zionist entity, is an arrow of liberation shot through the heart of the colonial project."
- (j) Thousands of protesters and counter protesters are expected at the Rally;
- (k) There is a serious risk of violence arising from or occurring at the Rally;
- (l) There is a serious risk that Rally will constitute mischief, a public or common nuisance, and intimidation contrary to section 180 of the *Criminal Code* and the common law;

- (m) There is a serious risk that conduct at the rally will constitute public incitement of hatred, wilful promotion of hatred or wilful promotion of antisemitism within the meaning of section 319 of the *Criminal Code*;
 - (n) There is a serious risk that the Rally will become or evolve into an unlawful assembly within the meaning of sections 63, 64, 175(1) and 180 of the *Criminal Code*;
 - (o) The Application raises a serious issue, the Applicant will suffer irreparable harm if the Order is not granted, and the balance of convenience favours the granting of the Order;
 - (p) The relief requested is proportionate, not overbroad, and demonstrably justified in a free and democratic society; and
 - (q) Section 101 of the *Courts of Justice Act*, R.S.O. 1990 c. C.43.
3. The following documentary evidence will be used at the hearing of the application:
- (a) The affidavit of Kenneth Weatherill, to be sworn;
 - (b) Such further and other evidence as the lawyers may advise and this Honourable Court may permit.

March 14, 2026

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Counsel to the Applicant

RCP-E 14E (September 1, 2020)

THE ATTORNEY GENERAL OF ONTARIO
Applicant

-and- JOHN DOE et al.
Respondents

Court File No.

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT TORONTO

NOTICE OF APPLICATION

LENCZNER SLAGHT LLP

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Toronto, ON M5H 3P5

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Counsel to the Applicant

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AFFIDAVIT OF KENNETH WEATHERILL

1. I, Kenneth Weatherill, of the City of Hamilton, MAKE OATH AND SAY:
2. I am an Assistant Deputy Minister of Public Safety for the Ministry of the Solicitor General of Ontario, and as such I have knowledge of the matters contained in this Affidavit.
3. This affidavit is primarily based upon open-source information, including information available in traditional and social media, which was assembled by counsel representing the Applicant. Where evidence is based on information provided by others, I have described the source of the information, and I readily believe it to be true.

PART I - MY BACKGROUND

4. Prior to accepting my current role, I worked for 35 years as a police officer. I have served in various progressively more senior positions including as the Deputy Chief of Police of the

Hamilton Police Service and then as the Deputy Chief of the Barrie Police Service, respectively. In my capacity as Deputy Chief, I managed the day-to-day operations of officers in the field in Hamilton and Barrie.

5. Between 2020 and 2023, I served as Deputy Inspector General for the Inspectorate of Policing and then as the Interim Inspector General of Policing of Ontario. My responsibilities included overseeing investigations into complaints and promoting modern, effective, and ethical policing practices across Ontario.

6. Since 2023, I have served as an Assistant Deputy Minister to the Solicitor General of Ontario in the Public Safety Division. My day-to-day responsibilities include advising the Solicitor General on matters of public safety and security, including the provincial government's response to civil unrest, large protest gatherings, and public events throughout Toronto and all of Ontario.

AL-QUDS DAY 2026 IN TORONTO

7. The 2026 Al-Quds Day Rally (the "Rally") in Toronto is scheduled for Saturday, March 14, 2026, at 3:00 p.m., commencing at the United States Consulate, located at 360 University Avenue, Toronto.

8. Based on my conversations with my colleagues and Toronto Police Services, I understand that the parade route is Queen and University, north to Dundas, East to Bay, South to Queen, West to University.

9. The Rally takes place, more or less, on Al-Quds day. I am advised that Al-Quds day originates from a declaration issued on August 7, 1979 by Ayatollah Khomeini, the founder of the

Islamic Republic of Iran. On that date, Khomeini declared that the last Friday of Ramadan should henceforth be known as Al-Quds Day.

10. A full profile of Ayatollah Khomeini was drafted by the Counter-Extremism Project, a non-governmental organization dedicated to combatting global extremist groups. A copy of that profile is available here: <https://www.counterextremism.com/extremists/ruhollah-khomeini>.

11. Based on the information in the profile of Ayatollah Khomeini, linked above, his original remarks marking the first Al-Quds Day, Ayatollah Khomeini stated that the purpose of Al-Quds day is for “all the Muslims of the world” to “join together to sever the hand of this usurper [Israel]” and to rally for “victory of the Muslims over the infidels”:

“I ask all the Muslims of the world and the Muslim governments to join together to sever the hand of this usurper [Israel] and its supporters. I call on all the Muslims of the world to select as Al-Quds Day the last Friday in the holy month of Ramadan — which is itself a determining period and can also be the determiner of the Palestinian people’s fate — and through a ceremony demonstrating the solidarity of Muslims world-wide, announce their support for the legitimate rights of the Muslim people. I ask God Almighty for the victory of the Muslims over the infidels”.

A. GROUPS IN ATTENDANCE AT THE RALLY

12. As set out below, the 2026 Al-Quds Day rally in Toronto appears to be promoted and attended by a coalition of groups, including:

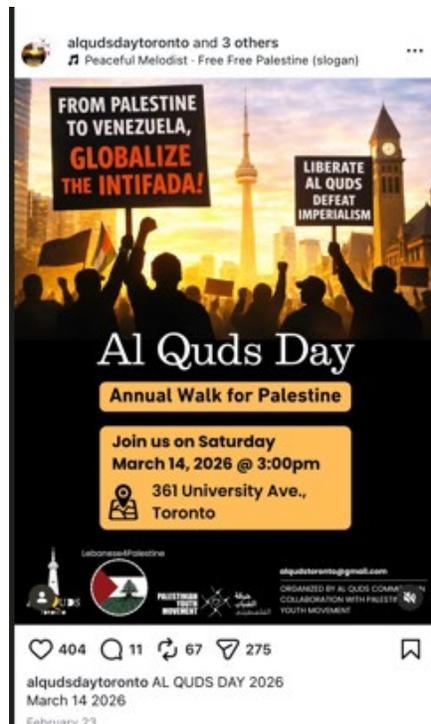
- (a) Al-Quds Day Toronto (also referred to as the Al-Quds Committee);
- (b) Palestinian Youth Movement;
- (c) Lebanese4Palestine; and,

(d) Samidoun, which is a designated terrorist organization according to the Canadian Government.

13. Further background information available into each of these groups, as well as examples of posts which appear to be promoting the Rally, are reproduced below.

(i) Toronto Al Quds Committee

14. The Toronto Al Quds Committee (the “Committee”), also known on social media as “Al Quds Day Toronto”, describes itself as a coalition involved in organizing and promoting the Rally. I am advised that the social media account for “Al Quds Day Toronto” has been active in organizing Al Quds day rallies and events since April, 2022. With respect to this year’s Rally, the Committee has been promoting Al Quds Day and encouraging members of the public to attend at 361 University Avenue at 3:00 pm on March 14, 2026:



15. On March 10, 2026, the Committee co-posted the digital flyer below, promoting the rally with two other organizations.



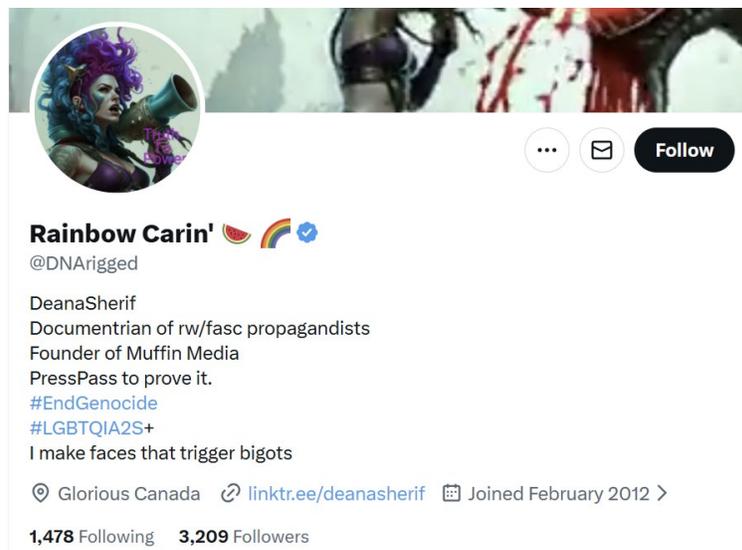
16. Certain individuals who appear to be members of the Committee, including an individual by the name of “Ali Mallah”, have been quoted in the media as spokespeople for the Rally and its organizers. Mr. Mallah gave quotes to CBC on behalf of the Committee, saying that the Committee “condemns any acts of terror, or so-called terror, or acts of violence against any synagogue” and that “the Committee always have been participating in a peaceful and civil gathering and march and speeches”. A CBC article with the quotes from Mr. Mallah, dated March 12, 2026 can be found at this link: <https://www.cbc.ca/news/canada/toronto/ont-al-quds-day-9.7126287>.

17. It appears Mr. Mallah has been involved in organizing Al Quds day rallies and protest activities since at least 2016. For example, at Toronto’s 2016 Al-Quds Day Rally, Mr. Mallah attended the protest and delivered remarks as a keynote speaker, which was recorded on YouTube.¹

¹ See B’nai Brith Canada, Ali Mallah, 2016 Toronto Al-Quds Day Remarks (Youtube: July 4, 2016), https://www.youtube.com/watch?v=HMBv7UF_rfo&t=365s.

I am aware that during those remarks, Mr. Mallah stated that “in the United States, if somebody makes a mistake and walks into someone’s home they will be shot, and right here in Canada, if somebody attacks us, we will attack them and shoot them, so why is it okay then for Israel to occupy Palestinian land and to oppress Palestinian people”. Later in his remarks, Mr. Mallah went on to encourage resistance of the occupation “by any means necessary”. An automatically generated transcript of Mr. Mallah’s 2016 Toronto Al-Quds Day remarks is attached hereto as **Exhibit “1”**.

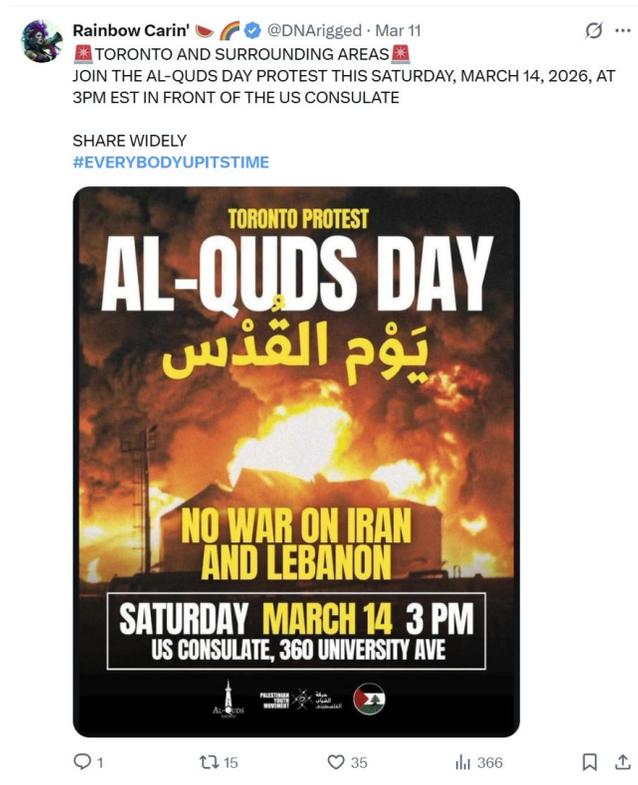
18. Another individual named Deana Sherif also purports to be a member of the Committee. Her X handle @DNArigged is copied below.



19. Ms. Sherif has previously been convicted of offences at other protests in Ontario. A CBC Article dated July 9, 2025 in which Ms. Sherif is described as “a woman known for her frequent presence at protests” who was found guilty of causing a disturbance and breaching bail conditions can be found at this link: <https://www.cbc.ca/news/canada/ottawa/ottawa-protester-who-used-squeaky-toy-found-guilty-of-causing-disturbance-1.7579876>. A Centretown Buzz article dated

February 6, 2026 describing her conviction on charges of criminal harassment and assault with a weapon (an electronic whistle) can be found at this link: <https://centretownbuzz.ca/2026/02/sherif-found-guilty-of-assault-by-noise-alone/>.

20. On March 11, 2026, Ms. Sherif's X account posted a copy of the flyer for the Rally with the hashtag "Everybodyupitstime":



21. On January 23, 2026, Ms. Sherif's X account re-tweeted a post (which has since been deleted) stating that "The big war is about to start. Brace yourselves and its time to fight like hell" as show below:

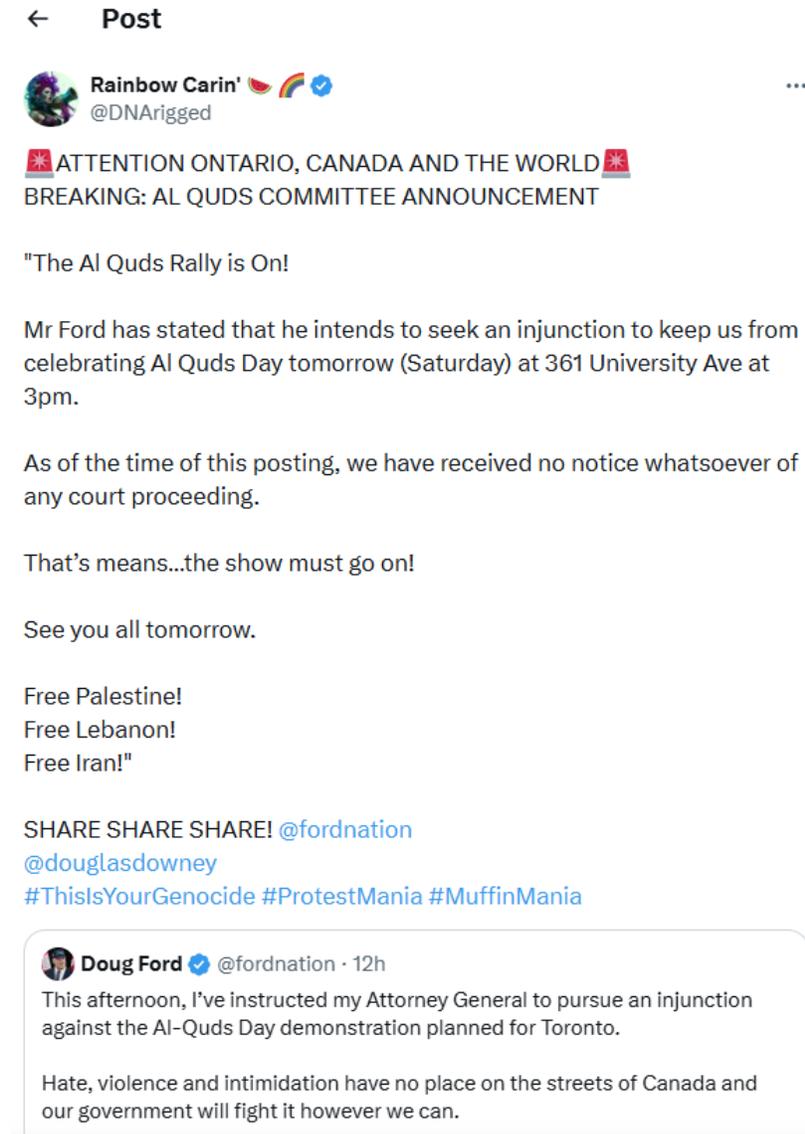


22. On March 12, 2026, Ms. Sherif's X account retweeted a post justifying the attack on Temple Israel in Michigan, discussed below.



23. On March 13, 2026, Ms. Sherif's X account purported to make an announcement on behalf of the Al-Quds Committee that the Rally would proceed on March 14 at 3 PM. The tweet includes

the statement “see you all tomorrow” which suggests to me that Ms. Sherif intends to attend the Rally.



(ii) *Palestinian Youth Movement*

24. The Palestinian Youth Movement (“PYM”) is a self-described “independent movement that organizes Palestinian and Arab youth to struggle for Palestinian liberation” and which “draws from the Palestinian revolutionary purpose”. PYM has chapters in 15 countries across the United States, Canada, and the United Kingdom, including a local chapter in Toronto. A self-published

blurb describing PYM's history can be found at this link:
<https://www.palestinianyouthmovement.com/about>.

25. PYM has multiple active chapters in Canada, including a chapter in Toronto. Based on the information set out in this affidavit, I am aware that the Toronto chapter of the PYM is involved in organizing and promoting the Rally and has been similarly involved with organizing previous Al Quds Day rallies in recent years.

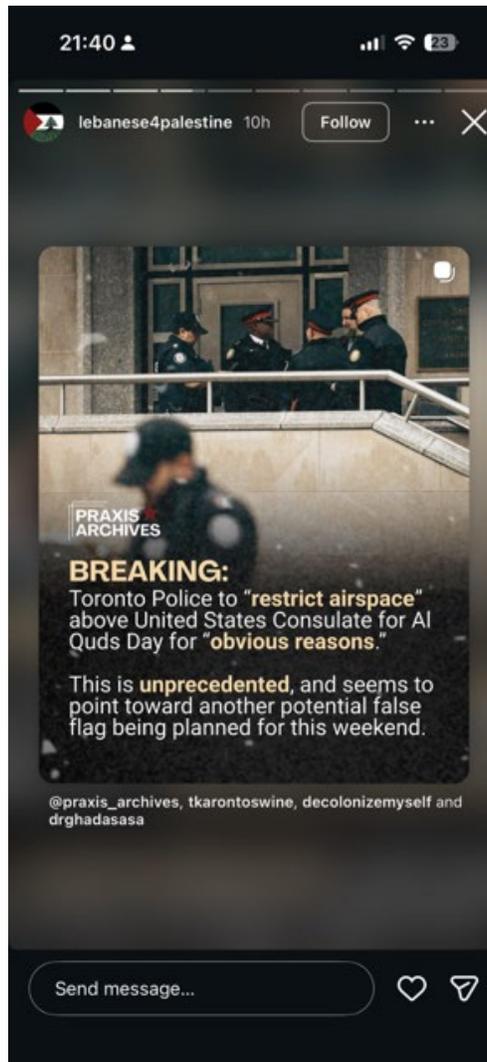
26. Recently, PYM has been involved in promoting the Rally on social media. On March 10, 2026, PYM made an Instagram post with the Committee and another group, Lebanese4Palestine, which featured an image of a building in flames with the caption "No war on Iran and Lebanon." The post promotes the Rally at the US Consulate.



(iii) Lebanese4Palestine

27. In addition to PYM and the Committee, the Instagram Post advertising the Rally was also promoted by a group called “Lebanese4Palestine”, who are listed on the post as co-organizers.

28. In an Instagram “Story” the Lebanese4Palestine account posted that the Toronto Police had restricted the airspace over the US Consulate noting that this closure “seems to point to another potential false flag being planned for this weekend”. A copy of the Instagram Post from the Lebanese4Palestine account is shown below:



(iv) ***Samidoun Palestinian Prisoner Solidarity Network***

29. Samidoun, also known as the Palestinian Prisoner Solidarity Network, has promoted participation in Al-Quds Day marches in Toronto. On October 15, 2024, the Government of Canada listed Samidoun as a terrorist entity under the *Criminal Code*. The October 15, 2024 News Release from the Government of Canada can be found at this link: <https://www.canada.ca/en/public-safety-canada/news/2024/10/government-of-canada-lists-samidoun-as-a-terrorist-entity.html>.

30. Samidoun is described on the list as follows (The list can be found at this link: <https://www.publicsafety.gc.ca/cnt/ntnl-scr/cntr-trrrsm/lstd-ntts/crnt-lstd-ntts-en.aspx#2024-03>)

Samidoun

Also known as

Palestinian Prisoner Solidarity Network

Description

Samidoun is an international network of organizers and activists that claims to be campaigning for the release of Palestinian prisoners in Israeli jails. The organization, which emerged in 2011, maintains at least 20 chapters across 12 countries, including Canada, the United States and France, amongst others. Samidoun also operates a chapter in Iran, which Canada has designated as a State Supporter of Terrorism. Many Palestinian prisoners for which Samidoun advocates for release have ties to terrorism, assassinations and countless attacks against Israel. Samidoun's ideology revolves exclusively around the worldview that Israel and Zionism are the greatest danger to the Middle East and the world. Their main goals are the destruction of Israel and establishing a Palestinian state in its place. To achieve this goal, Samidoun advocates all kinds of activities, including violence. The organization helps advance the interests of other listed terrorist entities such as the Popular Front for the Liberation of Palestine (PFLP) on social media and in public protests. According to open sources, Samidoun has close links with the PFLP, which is a listed terrorist entity in Canada, the United States and the European Union. The leadership of Samidoun is composed of reported current and former members of the PFLP.

Date listed

2024-10-15

Latest Date Reviewed

Not yet reviewed

31. As set out in the press release, the Government of Canada's listing of Samidoun was made in concert with the United States Department of the Treasury's designation of Samidoun as a

specially designated global terrorist (SDGT). Germany has similarly listed Samidoun as a terrorist entity.

32. In addition, the press release reports that Samidoun has close links with and advances the interests of the Popular Front for the Liberation of Palestine (PFLP), which is a listed terrorist entity in Canada, the United States, and the European Union.

33. Samidoun has issued a call to action for Al-Quds Day 2026, urging "mass mobilization and protest, direct actions and confronting the Zionist and imperialist war machine everywhere" set out in a release dated March 13, 2026:

Samidoun Palestinian Prisoner Solidarity Network reiterates our urgent call to action for Al-Quds Day, Friday, March 13, and throughout the weekend, March 14-15, for actions, mass mobilization and protest, direct actions and confronting the Zionist and imperialist war machine everywhere.

34. The release goes on to say “The Zionist entity and U.S. imperialism have misjudged the strength, resilience and determination of the Islamic Republic of Iran, of the Lebanese Resistance, and of the resistance front throughout the region. Every one of the missiles targeting U.S. bases and the center of imperialism in the region, the Zionist entity, is an arrow of liberation shot through the heart of the colonial project.” Attached as **Exhibit “2”** is a copy of the March 13, 2026 press release. It can also be found at this link: <https://samidoun.net/2026/03/international-al-quds-day-2026-a-call-to-action-for-al-quds-palestine-lebanon-iran-and-humanity/>.

35. The Samidoun press release links directly to the Instagram post from PYM announcing the protest:



B. EXPECTED COUNTER PROTEST ACTIVITY

36. Al-Quds Day events in Toronto historically attract counter-protesters from various groups, including pro-Israel organisations and Jewish community groups.

37. An Iranian Canadian was quoted in the National Post describing the event as "foreign interference in Canadian affairs" and as "a show of force by the Islamic regime in Canada. A copy of the March 12, 2026 article from the National Post can be found at this link: <https://nationalpost.com/news/canada/iranian-canadians-join-jews-in-condemning-al-quds-day-anti-israel-protests>. This suggests that Iranian-Canadian advocates who oppose the Islamic Republic of Iran may be expected to oppose the Al-Quds Day rally.

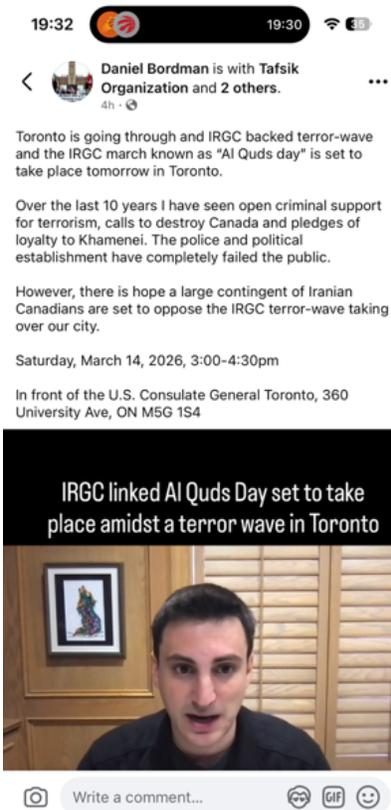
38. The presence of both anti-war demonstrators and Iranian-Canadian counter protesters at or near the event location creates a risk of confrontation. Recent incidents demonstrate that violence between these groups has already occurred in the Greater Toronto Area.

39. Salman Sima is an Iranian activist who organizes rallies and counterprotests against the Iranian Islamic Regime. A screenshot of Mr. Sima’s X profile is included below:



40. On or around March 12 and 13, 2026, Mr. Sima posted flyers to his social media account advertising a counterprotest at the Rally. The flyer and Mr. Sima’s subsequent posts state “Our police seem to be in bed with the jihadists. And the mayor has said its ok to celebrate terrorism. It is up to us. It is our civil duty. We the people will hold the line against Al-Quds Day...”. “We will fight smartly against the mercenaries of the Islamic Republic in Toronto....”. Four screenshots of Mr. Sima’s Facebook posts are attached as **Exhibit “3”**.

41. Tafsik Organization is a Jewish Civil Rights Group, combatting antisemitic hatred both in Canada and globally. This is described on their website: <https://tafsik.com/>. Tafsik has in the past attended Al-Quds Day counterprotests. Daniel Bordman is a journalist affiliated with Tafsik Organization. Mr. Bordman has made several posts from his social media accounts regarding counterprotests at the rally. In posts made on March 13, 2026, Mr. Bordman states that “The police and political establishment have completely failed the public. However, there is hope a large contingent of Iranian Canadians are set to oppose the IRGC terror-wave taking over our city” and “I just spoke to @SalmanSima, the organizer of the United Against Terrorism rally, he said that the rally is happening tomorrow even if there are “stones falling from the sky. I confirmed that this is a Persian metaphor for “we’re going to be there dead or alive”. Copies of Mr. Bordman’s social media posts are attached below:



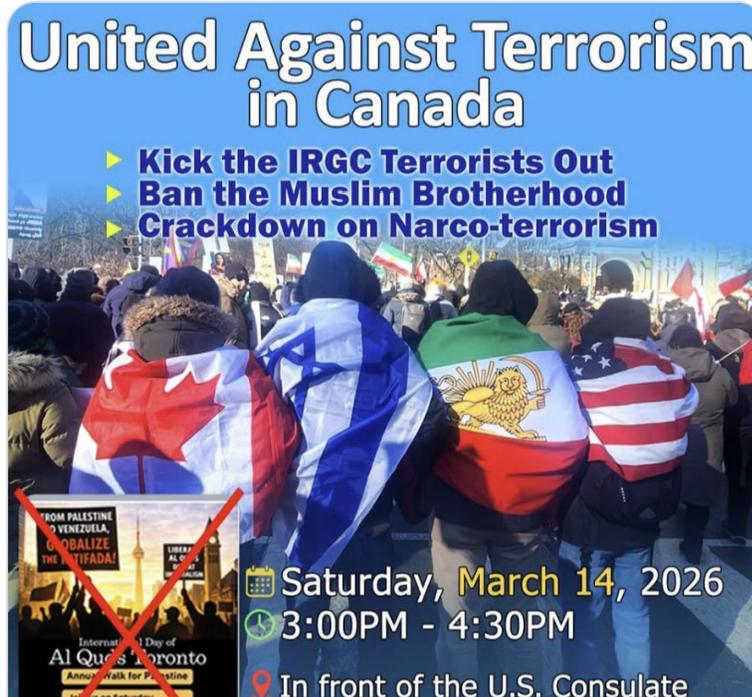


Daniel Bordman ✓ @DanielBordmanOG · 3h



I just spoke to @SalmanSima, the organizer of the United Against Terrorism rally, he said that the rally is happening tomorrow even if there are “stones falling from the sky”

I confirmed that this is a Persian metaphor for “we’re going to be there dead or alive”.



42. As an example of Iranian-Canadian counterprotests, on February 14, 2026, a Global Day of Action was held to support the “Lion and sun Revolution”, a movement seeking regime change in Iran. I am advised that at a large demonstration in the Yonge Street and Homewood Avenue area, an individual was arrested for a suspected hate-motivated assault after allegedly making comments to a participant and then punching the victim in the chest and face. The accused was charged with assault and wearing a disguise with intent. A February 16, 2026 news release from the Toronto Police Service relating to this incident is available here: <https://www.tps.ca/media-centre/news-releases/65237/>.

43. Similarly, on February 15, 2026, the Toronto Police Service arrested another suspect for making online threats targeting the rally. It is alleged that the accused made a threat on social media, to cause harm to rally participants and that the threat stated intentions of attending the demonstration with a firearm to prevent the gathering. A February 15, 2026 news release from the Toronto Police Service relating to this incident is available here: <https://www.tps.ca/media-centre/news-releases/65238/>.

44. The Province of Ontario is concerned that a significant number of counter protesters are going to attend the Rally which could lead to a public disturbance and violence. In my experience, demonstrations can pull large crowds, including counter protesters and agitators. There are often weapons present. Often, the self-interests of agitators and counter protesters run contrary to the intentions and message of a protest group. There is a possibility that the above mentioned parties may have a presence. They could attempt to incite public disruption and violence. Based on the social media posts referenced above, and the occurrences at February 14, 2026, a Global Day of Action, there is the potential for agitators and conflict between protesters and counter protesters to become violent.

A. THE IRAN WAR

45. Recent developments in the Middle East, including the ongoing military conflicts involving the United States, Israel, and Iran, have created an environment of heightened political tensions, public fear and uncertainty.

46. As has been widely reported, on June 13, 2025, Israel launched military strikes against Iran in what became known as the "Twelve-Day War." These strikes continued until a ceasefire was

declared on June 24, 2025. During the latter stages of the Twelve-Day War, the United States joined the military campaign, targeting Iran's nuclear infrastructure.

47. On February 28, 2026, the United States and Israel jointly launched military strikes against Iran, marking the beginning of a broader war. These strikes resulted in the death of Iran's Supreme Leader, Ayatollah Ali Khamenei, along with several other senior Revolutionary Guards commanders and key Iranian leadership figures.

48. Iran retaliated by launching attacks against Israel, United States military installations, and allied targets across the Middle East. As a result, the conflict remains ongoing and is rapidly expanding throughout the region.

49. Between 2022 and 2025, Iran experienced a significant wave of anti-regime demonstrations. The Iranian government responded with violence, resulting in mass killings of Iranian protesters. This unrest spread globally, with anti-regime protests emerging throughout the Iranian diaspora, including in Canada.

50. Following the February 28, 2026 Israeli-American strikes and the death of Ayatollah Khamenei, many members of the Iranian-Canadian diaspora held celebratory rallies, viewing these events as liberation from a brutal theocracy. Conversely, protests erupted in multiple countries, with demonstrators condemning the strikes as acts of aggression and calling for an end to foreign military intervention. A Canadian Affairs article dated March 6, 2026 discussing the growing tensions and contrasting views within the Iranian-Canadian diaspora community in the wake of the Iran War can be found at this link: <https://www.canadianaffairs.news/2026/03/06/iranians-are-not-a-monolith-iran-war-exposes-deep-divisions/>

51. The Al-Quds Day rally in Toronto takes place against this backdrop.

**B. ESCALATING ANTISEMITIC, ANTI-ISRAEL, AND ANTI-U.S. VIOLENCE
ACROSS THE WORLD**

52. In light of the recent strikes across the Middle East and the onset of the Iran War, news reports of violent incidents targeting Jewish, Israeli, and U.S. institutions have increased and accelerated beyond those in late 2023 – 2025 discussed below.

(i) The Temple Israel Synagogue Attack

53. On March 12, 2026, a 41-year-old perpetrator drove his vehicle to the parking lot of the Temple Israel synagogue in West Bloomfield Michigan. As reported by CTV, after waiting outside the synagogue for nearly two hours, he accelerated his vehicle into the building, striking and injuring a security guard in the process. 140 children, teachers, and staff were inside the synagogue at the time of the attack.

54. After the truck crashed through the doors of the synagogue and breached the synagogue's main hallway, the vehicle became engulfed in flames. The perpetrator then opened fire on those in the vicinity, and shortly thereafter died.. CTV News reports that “[h]is family was killed in an Israeli airstrike in Lebanon”.

55. A March 13, 2026 CTV News Article about the Temple Israel Synagogue Attack can be found here: <https://www.ctvnews.ca/world/article/investigators-work-to-determine-exact-reason-for-attack-at-michigan-synagogue/>

(ii) Attack on the U.S. Embassy in Norway

56. On March 8, 2026, police in Norway announced they were investigating an explosion which took place outside the United States embassy in the capital city of Oslo.

57. According to reports, the explosion was caused by an “improvised device placed at the entrance to the building”, and investigators are considering whether the bombing was a “targeted attack”. A time article dated March 11, 2026 which discusses both the attack at the Norwegian embassy and the attack on the consulate in Toronto, notes that “police also said there was a since-deleted video published on Google Maps around the time of the incident, which reportedly depicted Khamenei, alongside text in Farsi that read, “Allah is great, we are winning”. Three brothers were subsequently arrested by Norwegian police in connection with the bombing. The March 11, 2026 Time article can be found at this link: <https://time.com/article/2026/03/11/us-embassy-toronto-canada-oslo-consulates-shooting-attack-explosion/>.

(iii) Attacks on Jewish Places of Worship in Europe

58. Following the recent Israel-U.S.-Iran war, there have been multiple news reports about attacks on Jewish places of worship in Europe.

59. On Friday March 6, 2026, it is reported that there was an arson attack at the A.B.N. Davidsplein synagogue in Rotterdam in the Netherlands. A March 13, 2026 Jewish News Article reporting on this incident can be found at this link: <https://www.jewishnews.co.uk/new-islamic-movement-group-claims-responsibility-for-rotterdam-synagogue-arson/>.

60. On Thursday March 12, 2026, it is reported that there was an “attempted terror attack on .. at Det Mosaiske Trossamfunn synagogue in Trondheim, Norway amid reports of a significant presence of armed officers with protective shields on scene.” A March 12, 2026 Times of Israel article reporting on this incident is attached can be found at this link: https://www.timesofisrael.com/liveblog_entry/one-arrested-one-still-at-large-after-norway-synagogue-incident/.

61. An article in the Free Press notes, that “There were more synagogue attacks this week than days in the week. Last weekend: Three shootings at synagogues within a 10-mile radius in Toronto. On Monday: In Liège, Belgium, a synagogue was bombed. On Thursday at noon: A man with a rifle and explosives drove into a synagogue in West Bloomfield, Michigan. On Thursday afternoon: In Trondheim, Norway, police arrested a man for suspicious behavior outside a synagogue. On the earliest hours of Friday: There was an arson attack at a Rotterdam synagogue.” The March 13, 2026 Free Press editorial can be found at this link: <https://www.thefp.com/p/the-virus-of-antisemitic-violence>.

62. On March 14, 2026, the same date that I am swearing this affidavit, the BBC reports that “An explosion has damaged a Jewish school in the Dutch capital Amsterdam, in what the city mayor condemned as a "deliberate attack against the Jewish community". The March 14, 2026 BBC article can be found at this link: <https://www.bbc.com/news/articles/cwyg4j58gdyo>.

(iv) The Hanukkah Bondi Beach Terrorist Attacks in Australia

63. On December 14, 2025, two gunmen opened fire during a Hanukkah celebration on Sydney’s Bondi Beach. The shooting killed 15 people and was described by Australian Prime Minister Anthony Albanese as an act of “antisemitic terrorism”.

64. According to reports, the perpetrators targeted a local event called “Chanukah by the Sea” which celebrated the start of Hanukkah festivities. Those killed included a small child, an “assistant rabbi at Chabad of Bondi and an organizer of the event”, and a couple who were “both Holocaust survivors”.

65. A CTV News article describing the attack and its aftermath can be found here:

<https://www.ctvnews.ca/world/article/father-and-son-gunmen-kill-at-least-15-people-in-attack-on-hanukkah-event-at-sydneys-bondi-beach/>

C. INTERNATIONAL RESTRICTIONS ON 2026 AL-QUDS DAY RALLIES

66. On March 11, 2026, the United Kingdom government approved a request from the London Metropolitan Police to ban the Al-Quds Day march scheduled for Sunday, March 15, 2026.

Attached as **Exhibit “4”** is a March 10, 2026 press release from the Assistant Commissioner of the Metropolitan Police which can also be found at this link:

<https://news.met.police.uk/news/statement-on-al-quds-march-506983>.

67. The news release from Assistant Commissioner Ade Adelekan at the Metropolitan Police said that “The Al Quds march is uniquely contentious having originated in Iran and in London is organised by the Islamic Human Rights Commission, an organisation supportive of the Iranian regime.” He stated that the Metropolitan Police routinely polices hundreds of protests which have counter protesters including pro-Palestinian protests and pro and anti Iranian regime protests. But with respect to the Al Quds March, the Assistant Commissioner Stated:

The Al Quds march is uniquely contentious having originated in Iran and in London is organised by the Islamic Human Rights Commission, an organisation supportive of the Iranian regime.

...

Overall, the context is so uniquely complex and the risks are so severe that placing conditions on the protest will not be sufficient to prevent it from resulting in serious public disorder - running the risk of injury to members of the public, protestors, police officers and damage to property.

68. On March 13, 2026, the London Metropolitan Police issued an update that marches for the protests and counter protests were banned stating:

“Following consent from the Home Secretary, marches for both protests have been banned. As there is no law banning static protests, these will go ahead. This is a limited and specific ban; it will apply to Al Quds day protests and those countering. This ban will be in place for one month. The Met’s assessment is that a static protest will be easier to police and prevent the two sides from coming together. While this reduces the risk, we cannot completely rule it out. Those taking part in the Al Quds day protest must assemble on Albert Embankment, on the south side of the river Thames. The counter-protest must assemble on Millbank, the north side of the river Thames.”

A copy of the update from the Metropolitan Police dated March 13, 2026 at 2:15 PM is attached as **Exhibit “5”** and can be found at this link: <https://news.met.police.uk/news/public-order-update-507126>.

PART II - RECENT ACTS OF VIOLENCE IN TORONTO

A. 2023 – 2025 ANTISEMITIC VIOLENCE IN CANADA

69. Following the October 7, 2023 attack against Israel, news reports indicate that Canada experienced an increase in violence targeting Jews residing in Canada, especially in Toronto, home to Canada’s largest Jewish population.

70. The Anti-Defamation League has published an article which summarizes all the attacks on synagogues in Canada since October 7, 2023. I believe that article accurately reflects incidents which have occurred in Canada. The article quotes as follows:

- **November 2025, Toronto, Canada:** The Kehillat Shaarei Torah synagogue in Toronto was vandalized on November 4, 2025, with security video capturing a suspect smashing five of the synagogue’s windows in multiple areas. The synagogue had been targeted on multiple occasions.
- **September 2025, Halifax, Canada:** Two Halifax synagogues were vandalized with antisemitic graffiti, and a building associated with the Chabad movement was also defaced with the words, "Jews did 9/11."
- **August 2025, Victoria, Canada:** Death threats and violent antisemitic messages were scrawled on the front doors of Congregation Emanu-El, one of Canada’s oldest synagogues, in Victoria, BC on August 2, 2025.
- **March 2025, Toronto, Canada:** Suspect Amir Arvahi Azar was charged with 29 criminal counts for an alleged hate crime spree spanning eight months that targeted five

Toronto synagogues and a Jewish community center. The charges included advocating the genocide of Jews, inciting hatred, arson, and property damage. Azar was arrested on January 11, 2025, for alleged attacks between April 2024 and early January 2025, including arson of signs at Temple Sinai and Tiferet Israel Congregation on July 31 and August 3, 2024, property damage at Pride of Israel Synagogue on June 30, 2024, and damage and later arson at Kehillat Shaarei Torah Synagogue on June 30 and July 31, 2024. He's also under suspicion of setting fire to a United Jewish Appeal sign on April 26, 2024, and property damage at the Jewish-owned eatery, Café Landwer, on December 20, 2024. The suspect was also charged with possession of three either prohibited or restricted loaded handguns.

- **December 2024, Toronto, Canada:** The Kehillat Shaarei Torah synagogue in Toronto was vandalized, with decals of “genocide” placed on two signs on the property.
- **December 2024, Montreal, Canada:** Overnight on Dec 18, 2024, Congregation Beth Tikvah in Montreal's Dollard-des-Ormeaux area was firebombed for a second time, following a similar attack in November 2023. The synagogue sustained some fire damage and a door and window were broken. There were no injuries. A suspect was arrested in the case.
- **July 2024, Calgary, Canada:** "Free Palestine," “the flood is coming,” and an [inverted red triangle](#) were [graffitied](#) near a synagogue and Jewish day school.
- **May 2024, Vancouver, Canada:** A suspected incendiary device was launched at Congregation Schara Tzedeck in Vancouver, BC, on May 30, 2024, while some members were nearby. There were no injuries. The door to the synagogue sustained damage.
- **May 2024, Toronto, Canada:** The windows and doors of Kehillat Shaarei Torah in Toronto, Canada, were smashed in a second vandalism attack on the synagogue in less than a month, on May 17, 2024.
- **April 2024, Toronto, Canada:** The windows of Kehillat Shaarei Torah in Toronto, Canada, were smashed in a vandalism attack on April 19, 2024.
- **November 2023, Montreal, Canada:** Congregation Beth Tikvah in Montreal's Dollard-des-Ormeaux area was first firebombed on November 7, 2023, shortly after the Hamas October 7 attacks. The building sustained some damage. According to subsequent media coverage, no suspects have been arrested.

71. The Anti-Defamation League’s article summarizing these incidents can be found here:

<https://www.adl.org/resources/article/tipping-point-canadas-jewish-community-faces-unprecedented-threat-three>

72. On August 8, 2025, a Jewish man was attacked in Montreal. As reported by the CBC, “the victim gets up on his knees and one of his children can be seen clinging to him. The attacker picks up some belongings in a grocery bag and then tosses what appears to be a kippa, a head covering traditionally worn by Orthodox Jewish men and boys, into a splash pad area.” A CBC article about

this incident can be found here: <https://www.cbc.ca/news/canada/montreal/assault-bodily-harm-charges-jewish-man-1.7606709>

73. Jewish schools have also been the target of attacks. On May 25, 2024, the Toronto Police Reported that the Bais Chaya Mushka Elementary School was the subject of gunfire directed at it. On October 12, 2024, the school was attacked again. Toronto Police report that 14 shell casings were found. The Police Report stated that the October 12 shooting was “the second incident at the school and it occurred on Yom Kippur that is a sacred day for the Jewish community, making it even more devastating.” The Police charged two individuals in relation to the second shooting. An October 18, 2024 statement from the Toronto Police Service relating to this incident can be found here: <https://www.tps.ca/media-centre/stories/arrests-in-firearm-discharge-at-jewish-school/>.

74. The Bais Chaya Mushka Elementary School was reported to have been shot-at a third time on December 20, 2024. As reported by the CBC, “Security video captured a vehicle pull up to the school, a passenger get out and fire at the building before getting back in and speeding away, MacIntyre said. The school was empty at the time and no injuries were reported, he added. Investigators believe a total of six shots were fired. Responding officers found bullet holes in the front facade of the school.” A CBC article from December 2024 detailing this incident can be found here: <https://www.cbc.ca/news/canada/toronto/bais-chaya-mushka-gunshots-toronto-1.7416067>

75. Jewish owned or affiliated business and institutions have also been the targets of vandalism and violence.

76. On October 19, 2023, a group of protestors targeted Café Landwer, a “Jewish-owned business” at the intersection of University Ave. and Adelaide St. in Toronto, Ontario (adjacent to the location of the proposed Rally). CTV reported that “[v]ideos posted online Saturday show hundreds of protesters waving Palestinian flags outside of Cafe Landwer at University Avenue and Adelaide Street while chanting “boycott.”” Toronto Mayor Olivia Chow is quoted as stating “[t]argeting a business in this way is wrong. There is no place in our city for antisemitism, Islamophobia, hate, intimidation and harassment of any kind,” Member of Parliament Kevin Vuong is quoted as saying “The restaurant targeted, Cafe Landwer, was “singled-out” for the fact that it is Jewish-owned”. A CTV article dated October 23, 2023 can be found here: <https://vancouver.ctvnews.ca/toronto/article/toronto-mayor-condemns-pro-palestinian-protest-that-targeted-jewish-owned-restaurant/>

77. On May 15, 2025 the same Café Landwer location was targeted again by protestors. CityNews reports that “demonstrators stopped marching and paused in front of a business where customers were seated on the patio. “A man involved in the demonstration ignited a flare, producing thick smoke that prompted patio customers to leave the area,” TPS wrote in a press release issued Friday. ... Patrons were visibly bothered by the smoke, and some were spotted retreating inside for a reprieve. One woman came out of the restaurant to shout at the police. “Why aren’t you stopping them?” she yelled.”” A CityNews article dated May 16, 2025 can be found here: <https://toronto.citynews.ca/2025/05/16/toronto-protester-ignited-smoke-canister-near-cafe-landwer-charged/>.

78. On November 10, 2023, the CBC reported antisemitic vandalism at an Indigo bookstore at Bay and Bloor in Toronto, Ontario. The CBC report states “Police called the mischief “hate-motivated.” The vandalism included a number of posters accusing CEO Heather Reisman, who is

Jewish, of funding genocide, while red paint was also splashed across a glass door.” A link to the CBC article quoted from can be found here: <https://www.cbc.ca/news/canada/toronto/indigo-vandalism-charges-1.7037711>.

79. On February 12, 2024, it was reported that protestors targeted Mount Sinai Hospital, which is adjacent to the location of the proposed Al-Quds Day Rally. CTV reports that protestors were seen climbing scaffolding and climbing onto the roof of the hospital. While Mount Sinai is a public hospital, CTV notes that it was “founded by the Jewish community in Toronto.” The CTV article states that “Prime Minister Justin Trudeau is calling a demonstration – now under police investigation – outside of Toronto's Mount Sinai Hospital on Monday a "reprehensible" display of antisemitism. ... Trudeau posted a statement on ... Twitter, in response to the protest. “Hospitals are places for treatment and care, not protests and intimidation,” ... In a statement to CTV News Toronto, Toronto4Palestine said it is “shameful” to see the Prime Minister and other elected officials call their “peaceful protest” antisemitic. “[Mount Sinai hospital] just happens to be along our regular rally route, which we pass by on a usual basis, as we head to rally in front of the U.S. consulate,” the statement reads in part. The consulate is down University Avenue from the hospital, just south of Dundas Street.” The February 13, 2024 CTV News quoted from can be found here: <https://www.ctvnews.ca/toronto/article/toronto-police-investigating-demonstration-outside-of-mount-sinai-hospital-after-trudeau-calls-it-reprehensible-antisemitism/>.

80. The CBC reported that in January, 2025, “a kosher restaurant business was broken into at two locations in separate incidents”. On Friday January 10, 2025, “the office of La Briut in the area of Yonge Street and Doncaster Avenue in Markham was broken into, vandalized and sprayed with anti-Semitic graffiti”. Then, on Sunday January 12, 2025 “its restaurant in Toronto on Alness Street, near Dufferin Street and Steeles Avenue West, was broken into... its front door shattered

and money stolen”. A January 13, 2025 CBC article reporting on this incident can be found here:

<https://www.cbc.ca/news/canada/toronto/police-investigate-two-break-ins-antisemitic-graffiti-1.7430434>

81. This incident, and others, gathered international attention as it was reported in the Jerusalem Post. A January 14, 2025 Jerusalem Post article reporting on this incident can be found

here: <https://www.jpost.com/diaspora/antisemitism/article-837492>

B. 2026 ESCALATION IN ANTISEMITIC VIOLENCE IN TORONTO

82. Between March 2 and March 7, 2026, three separate incidents involving gunfire directed at synagogues in the Greater Toronto Area occurred within a period of approximately five days.

A fourth shooting incident targeting a Jewish business occurred on March 1, 2026.

83. On March 2, 2026, gunshots were fired toward Temple Emanu-El, a synagogue located in a residential neighborhood in the North York area of Toronto. Officers from the Toronto Police Service responded and observed bullet damage to the building’s windows. No injuries were reported.

84. Deputy Chief Rob Johnson is reported as saying “We recognize that this does not occur in isolation...Members of Toronto’s Jewish community have been experiencing a deeply troubling rise in antisemitism, and we see the impact of that every day”. A March 3, 2026 media release

from the Toronto Police Service relating to this incident can be found here: <https://www.tps.ca/media-centre/stories/investigating-shots-fired-at-synagogue/>.

85. Several days later, on March 6, 2026, gunshots were fired toward Beth Avraham Yoseph of Toronto Congregation. Investigators from York Regional Police reported that multiple rounds

struck the front entrance doors of the synagogue. Within approximately the same timeframe during the night of March 6–7, 2026, additional gunshots were fired at Shaarei Shomayim Synagogue, where bullet damage was similarly discovered to the exterior entrance area of the building. No physical injuries were reported in connection with either synagogue incident. A March 7, 2026 CTV News article detailing both of these shootings is available here: <https://www.ctvnews.ca/toronto/local/york/article/shots-fired-at-two-synagogues-in-north-york-and-thornhill-overnight/>

86. On March 1, 2026, there were reports of Jewish-owned businesses that was shot-at near Dufferin and Steeles. The National Post reports that a shooting occurred “at a North York business plaza owned by a “prominent member of the Russian Jewish Community” and which is home to Old Avenue Restaurant & Bakery, a business co-owned by “Esther Bakinka, a courageous fighter for protection of our Jewish Community,” according to Toronto deputy mayor Mike Colle who, in a Facebook post, said Ottawa and the province need “to step up.” A March 3, 2026 National Post News article detailing the March 1 shootings and the March 2 synagogue shootings is available here: <https://nationalpost.com/news/canada/toronto-synagogue-gunfire-targeted-incident>

87. These attacks are unprecedented for the following reasons:

- (a) They occurred in very close succession;
- (b) They were all violent, involving gunshots;
- (c) The attacks took place shortly after the start of the Iran War;
- (d) The attacks took place in the weeks leading up to Al Quds day;

- (e) The list of attacks on Jewish institutions and individuals between November 2023 and December, 2025 noted above did not involve three similar synagogue shootings so closely together; and
- (f) These recent shooting attacks took place contemporaneously with the attack on Temple Israel in Michigan, the attack on the US Consulate and attacks on Iranian-Canadian activists (referenced elsewhere in this affidavit).

C. ISLAMOPHOBIA AND ANTI-MUSLIM VIOLENCE IN TORONTO

88. In addition to the above-referenced escalation in antisemitic violence, there have also been concerning reports of Islamophobic hate crimes and anti-Muslim violence in Toronto.

89. For example, on February 13, 2026, Toronto police announced they were investigating after a Toronto-area mosque “received two phone calls threatening violence against the mosque and its staff”. According to a CBC news article, the caller warned that “Another Christchurch” is going to happen to Toronto’s Muslim community, referring a prior shooting which “killed 51 Muslims praying at two mosques in Christchurch, New Zealand in 2019”. A February 13, 2021 CBC news piece about the threats is available here: <https://www.cbc.ca/news/canada/toronto/police-toronto-islamic-centre-phone-call-9.7089870>.

90. I have been advised of additional examples of Islamophobic threats made towards mosques in Ontario. In September 2025, Inspector Stu Garner of the York police acknowledged to the media that a man had made threats to blow up a local Mosque and a Muslim family’s house in Newmarket. According to a CBC news article, the incident was being investigated as a potential hate crime. A CBC news article dated September 8, 2025 discussing this incident is available here:

<https://www.cbc.ca/news/canada/toronto/newmarket-hate-crime-threats-blow-up-mosque-family-house-1.7627831>.

91. Similarly, in January 2026, there have been reports of violent threats made to a mosque located in Pickering, Ontario. According to a media release from the Durham Regional Police, a suspect was identified and arrested in connection with the threats. As a result, Durham Police are “working closely with community leaders” to ensure safety measures going forward. A copy of the Durham Regional Police’s January 30, 2026 press release is available here:

<https://www.drps.ca/news/posts/male-arrested-after-online-threats-made-toward-mosque-in-pickering/>.

D. VIOLENCE IN TORONTO TARGETED AT IRANIAN CANADIAN ACTIVISTS

92. On or about March 1, 2026, a commercial property associated with Iranian-Canadian activist Salar Gholami was targeted in a shooting in Thornhill, Ontario. The property, known as Saliwan Boxing, is a boxing gym owned and operated by Gholami. A copy of the National Post article reporting on this incident, dated March 2, 2026, can be found at this link:

<https://nationalpost.com/news/canada/iranian-owned-toronto-area-boxing-gym-targeted-by-gunfire> .

93. According to reports, officers from York Regional Police responded to reports of gunfire and later determined that multiple rounds had been fired at the building, causing significant damage to the front windows and exterior of the premises. No injuries were reported as the premises were unoccupied at the time.

94. Based on the reports referenced below, I am advised that the gym and its owner had recently been associated with public demonstrations organized by members of the Iranian diaspora

in Canada. Gholami is known as an organizer of large rallies in the Toronto area expressing support for protests and political change in Iran and criticizing the government of the Islamic Republic. In the months preceding the shooting, he had helped organize and promote several large demonstrations in Toronto in solidarity with protesters in Iran, including rallies drawing tens of thousands of participants across the GTA. A copy of a City News article describing the protests, dated February 28, 2026, can be found at this link: <https://toronto.citynews.ca/2026/02/28/polarized-world-is-fuelling-a-growing-number-of-protests-in-canada-police-say/> .

95. As described above, the shooting occurred during a period of heightened political tension following developments related to the Iranian government and ongoing military conflicts involving Iran. Media reports noted that the attack took place only hours after a gathering at the premises where supporters had assembled in connection with developments in Iran, including reactions to the reported killing of Iran's Supreme Leader.

96. Gholami publicly stated that he believed the incident was connected to his activism and criticism of the Iranian government, describing the gunfire as an act of intimidation directed toward Iranian dissidents living in Canada. A copy of an Iran International article dated March 04, 2026, further covering this incident can be found at link: <https://www.iranintl.com/en/202603024296> .

E. SHOOTING AT THE U.S. CONSULATE

97. According to police reports, on or about March 10, 2026, at approximately 4:30 a.m., multiple gunshots were fired at the United States Consulate General in Toronto, located at 360 University Ave.

98. Toronto Police Services have described the incident as a national security matter and continue to investigate. Police also stated that they do not look at the consulate shooting "in isolation" but rather "collectively" with other recent incidents, including the synagogue shootings. A copy of the Toronto Police Service article reporting on the incident, dated March 10, 2026, can be found at this link: <https://www.tps.ca/media-centre/stories/suspects-sought-in-consulate-investigation/>.

99. The shooting at the United States Consulate is particularly concerning, as it has been a focal point for protests both in support of and against the U.S.-Israeli military operations in Iran. In January 2026, hundreds of people gathered outside the consulate to protest against the Iranian regime and call for U.S. intervention against the government's crackdown on protests. On February 28, 2026—the same day the U.S. and Israel launched military strikes against Iran—anti-war protests were held at the consulate.

100. At the press conference, the RCMP Chief Superintendent Chris Leather stated the increased security at U.S. and Israeli diplomatic facilities is "fairly obvious, based on the incidents that have occurred here in Toronto and elsewhere, that these consulates deserve a heightened amount of vigilance and security at this time in the hopes that we can bring the temperature down in the coming days and weeks." A copy of the CNN article, dated March 10, 2026 can be found at this link: <https://www.cnn.com/2026/03/10/americas/us-consulate-shooting-toronto-latam-intl>.

PART III - TORONTO POLICE SERVICES RESPONSE

101. In my role as an Assistant Deputy Minister of the Solicitor General of Ontario, I am regularly in contact with the Toronto Police service.

102. I understand that the Toronto Police have laid out operational plans for increasing their presence in the area and managing the Al-Quds rally, while acknowledging the “heightened geopolitical tensions.” They have activated their Major Incident Command Centre and restricted airspace above and around the U.S. Consulate. A copy of the Toronto Police Service bulletin, March 12, 2026, can be found at this link: <https://www.tps.ca/media-centre/stories/increased-police-presence-at-al-quds-rally/> .

103. As per the March 12, 2026 press release, police anticipate attendance could exceed 3,000 people, and have concerns about “the potential for hateful rhetoric, as well as the possibility of confrontation between individuals or groups with opposing views”. The March 12, 2026 press release also acknowledges that recent antisemitic incidents have “heightened concerns and contributed to a greater sense of fear and unease in the city”.

104. Police intend to monitor the demonstration for incidents involving hate speech and signage, hate-motivated crimes or the display of symbols associated with groups designated by the federal government as terrorist organizations. I anticipate that police will be looking for agitators, violence, weapons, hate speech, and/or threatening signage. At demonstrations, specific attention must be paid to agitators, weapons offenses, and/or any individuals who may be motivated to cause injury and damage to other attendees. In my experience there is a high probability weapons in larger crowds, risk of incendiary devices, risks of agitators not involved in the event. Those are the kinds of things that police are looking for.

105. I understand that Toronto Police Services have open dialogue with event organizers leading up to today. At the time of this affidavit, I believe that that dialogue is still occurring.

106. In my experience, large demonstrations and protests can draw large crowds, counter protesters and agitators who may bring weapons to the demonstration and act out of self interest contrary to the intention of organizing committee. Given the current geo-political climate, the very recent attacks against Iranian-Canadians, the Toronto Jewish community, Jewish places of worship, and the statements from the terrorist organization Samidoun there is a risk that violence or uncontrolled disruption could occur without warning.

PART IV - SERVICE

107. On March 13, 2026, Ontario Premier Doug Ford made a public announcement that he would be instructing the attorney general to pursue an injunction to stop the Al-Quds rally, scheduled to proceed on March 14, 2026, outside of the U.S. consulate. A copy of Premier Ford's video with this announcement, posted to X on March 13, 2026, can be found at this link: <https://x.com/fordnation/status/2032525305764532310?s=20> .

108. On March 13, 2026, Ms. Sherif's X account purported to make an announcement on behalf of the Al-Quds Committee, that counsel for the Committee is Stephen Ellis, providing Mr. Ellis' contact information.



AFFIRMED BEFORE ME at the City of Toronto, in the Province of Ontario on March 14, 2026, in accordance with O. Reg 431/20, administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits
(or as may be)



(Signature of deponent)

THE ATTORNEY GENERAL OF ONTARIO
Applicant

-and- JOHN DOE et al.
Respondents

Court File No.

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT TORONTO

AFFIDAVIT OF KENNETH WEATHERILL

LENCZNER SLAGHT LLP

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Email: zachary.green@ontario.ca

RCP-E 4C (September 1, 2020)

This is Exhibit “1” referred to in the Affidavit of Kenneth Weatherill, affirmed at the City of Toronto, in the Province of Ontario, before me on March 14, 2026, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

00:00:01

I'm honored to invite one of our most vocal critics of unjust policies and also a champion of Justice Brother Ali. Brother, I am truly honored to be with you, a Young Generation coming out to stay with us in a Justice and solidarity follow of Palestine so the honor is ours with this young people who are growing up on the basis of fairness freedom and Justice Brothers and Sisters of course friends and comrade as previous speakers we salute you for being here again and we will be back

00:00:48

We will continue marching we'll never get tired will never get up until Palestine all Palestine from The River To The Sea will be [Applause] freea will be free brothers and sisters some of you might be tired and rightly so Ramadan Mubarak to all of you and especially for the people who are fasting but just think and reflect of our prisoners of the people who are under siege just today the IL legal state of Israel has imposed a total Siege on the town of heon 700,000 people are under siege. Shame!

00:01:43

And the rest of the International Community is doing nothing no see no here and what the irony is be it Mr Obama or Mr selfie I mean Mr tro you know you know talk about fairness talk about democracy but those words do not include the dictionary for the Palestinian people and against the illegal occupation of Palestine brothers and sisters don't underestimate your action action trust me trust me the state illegally state of Israel is investing millions and millions of dollars to buy a journalist

00:02:37

To buy a politician or writers to attack you because you support BDS just imagine supporting PDS has cost the Israeli State more than 50 million and they will invest more because they are in a panic mode because you are scaring the hell of them and they should be because we will never never leave Palestine or Palestinian and also if you remember about a month ago or two and I say this with a great sort of sadness and insult because Mr Trudeau who promised us a new era of Canadian politics has proven his another milder

00:03:30

copy of Stevie when it comes to the international politics and issues shame and more than shame what business does the parliament of Canada trying to intimidate you and me over by divestment and sanction well we are in a Canadian Society on a Canadian land by original people for to start with and we value the freedom of expression and the right to descend and we have the right to have our public political opinion and we say to Mr Trudeau and to the rest of the Canadian parliamentarian who showed no guts no bravery no honor

00:04:20

but voted against you because you support BDS we tell them we are the Real Canadian who reflect the Canadian values of equity equality diversity respect and freedom and against oppression and aggression they don't we [Music] do brothers and sisters we will be marching shortly and I urge all of us to March behind the banner and follow with the brothers and sisters with the Marshal vest we want to have an orderly fashion March because this is we are and before we leave we have to make sure that when we

00:05:05

talk to others we to say criticizing the illegal occupation of Palestine is not an anti-Semitism it is your right and duty to say that Israel is a illegal State and is an occupational State as a matter of fact and I have two rabbis here I will say equating Zionism with a jism is anti-Semitism equating Zionism and Judaism is anti-Semitism not the other way around equating Israel as the state for the Jews is anti-Semitism because we have so many noble Jews brothers and sisters rabbis and secularist are refusing to accept

00:05:57

that Israel as a state to be their state at the expense of Palestinian over Palestinian life Palestinian land and again as we said it before we salute the resistance against occupation by any form and by any manifestation comes across people who are oppressed who are occupied again have the right to resist their occupation by any means necessary yeah who tell you something else. in the United States if somebody made a mistake and walk into somebody's home, they will be shot.

00:06:44

right here in Canada if somebody attack us we will attack them and shoot them correct so why is it okay then to occupy Palestinian land and to oppress Palestinian people don't be afraid for what you're doing be proud and keep your head high up and also inshallah we start marching we will be marching now as soon as we get the signal but remember brothers and sisters there is no option but to speak up no option but to resist because if you side with the oppressor if you side with the aggressor if you say nothing we are complacent and

00:07:34

we will never be, we will always say justice for Palestinian and freedom for Palestine the people United will never be defeated the people United will never be defeated the people United will never be defeated give the United will never be defeated

This is Exhibit “2” referred to in the Affidavit of Kenneth Weatherill, affirmed at the City of Toronto, in the Province of Ontario, before me on March 14, 2026, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

International Al-Quds Day 2026: A call to action for Al-Quds, Palestine, Lebanon, Iran, and humanity

13 March 2026



This year, in 2026, the International Day of Al-Quds, the international day of action held on the third Friday of Ramadan for the Palestinian cause and the liberation of Jerusalem from Zionism and imperialism, takes on an extremely urgent and historic significance. Marked since 1979, when it was first declared by Imam Ruhollah Khomeini, this year's commemoration arrives amid one of the most dangerous escalations faced by the peoples of the region. As the world marks the 47th International Al-Quds Day, the struggle for the liberation of Palestine and Jerusalem stands at the center of a regional and global confrontation with Zionism and imperialism.

Samidoun Palestinian Prisoner Solidarity Network reiterates our urgent call to action for Al-Quds Day, Friday, March 13, and throughout the weekend, March 14-15, for actions, mass mobilization and protest, direct actions and confronting the Zionist and imperialist war machine everywhere.

As the Masar Badil, the Palestinian Alternative Revolutionary Path Movement and the Popular Democratic Party in Lebanon appealed: "Declare International Quds Day, Friday, March 13, a global day against war and aggression, and a day of solidarity and unity for Palestine, Iran, and Lebanon, affirming the peoples' right to liberation, sovereignty, and self-determination."

On this Al-Quds Day, the Islamic Republic of Iran is engaged in a major battle in defense of its sovereignty and in defense of al-Quds, Palestine, and the peoples of the region against the aggression of the Zionist occupation and its imperialist sponsors, the United States and its European, British, Canadian and Australian partners. Iran is confronting a relentless war of aggression and daily war crimes carried out by U.S. and Zionist forces. The Leader of the Islamic Republic, Imam Sayyed Ali Khamenei, was martyred while preparing the defense of the nation and confronting this aggression, after a lifetime devoted to scholarship, leadership, service and deep faith in God, the Islamic Republic and the people of Iran and to the cause of Palestine and Al-Quds.

The Islamic Republic of Iran does not stand alone in this struggle. Across the region, the Resistance Front is confronting the expanding war of imperialism and Zionism.

In Lebanon, the Resistance continues to defend Lebanon, Palestine and al-Quds in the face of constant aggression. During the so-called "ceasefire" observed only by one side for 15 months, the Zionist occupation carried out more than 15,000 violations, including assassinations, abductions of Lebanese political prisoners, and massacres in the Beqaa and in the Palestinian refugee camp of Ain el-Helweh. In the early hours of Thursday, March 12, Zionist forces, armed and backed by the U.S. and supported by the European imperialist powers, bombed displaced civilians in tents on the beach in Ramlet al-Baida, Beirut; later on the same day, amid a series of massacres and assaults, they bombed the Lebanese University in Beirut, martyring two prominent academics.

Over 800,000 Lebanese, including Palestinian refugees from the camps, have been displaced from the South of Lebanon and al-Dahiyeh, the southern suburbs of Beirut, while the Zionist drones, planes, and naval forces carry out massacres, assassinations and an overall assault on Lebanon, as they seek to occupy and colonize south Lebanon, destroy al-Dahiyeh and remake Lebanon as a subservient vassal to Zionism and imperialism.

Amid this assault, Hezbollah is leading a powerful Resistance that has astounded the enemy and the world with its coordination and strength, repelling invading occupation forces and once again decolonizing the north of Palestine with its missiles. The armed resistance in Lebanon is defending the sovereignty and future of Lebanon – and of Palestine.

In Iraq, Resistance forces continue to confront the presence of U.S. and European imperialist forces and defend the sovereignty of the country and the cause of Palestine, liberating Iraq of the foreign military bases that seek to plunder Iraq's wealth and direct its future.

In Yemen, the people and armed forces remain mobilized in their millions in defense of Palestine and the region, providing an inspiring example of collective popular and military mobilization against imperialist domination that stands before the world.

The Palestinian resistance, in the occupied homeland and everywhere in exile and diaspora, has confronted the genocidal Zionist colonial project for more than 78 years, armed, funded and directed by British, U.S. and European imperialism. Following the launch of the Al-Aqsa Flood and the historic operation of 7 October 2023, the day that changed the world, the Zionist regime has escalated its genocidal campaign against Gaza and against the Palestinian people as a whole. Once again, there is an unjust, so-called "ceasefire" that exists for one side only, as the occupation continues its massacres with the full political, military and financial support of the United States and its European imperialist partners and the so-called "Board of Peace," which is nothing more than a council of war, empire and plunder.

The Zionist entity and U.S. imperialism have misjudged the strength, resilience and determination of the Islamic Republic of Iran, of the Lebanese Resistance, and of the resistance front throughout the region. Every one of the missiles targeting U.S. bases and the center of imperialism in the region, the Zionist entity, is an arrow of liberation shot through the heart of the colonial project.

Internationally, Al-Quds Day carries a clear responsibility: to build the international popular cradle of the resistance that can be a meaningful partner in the Resistance Front. This Al-Quds Day must be a powerful day of mobilization, popular action and mass demonstration for Iran, Palestine, Lebanon, Yemen, Iraq and all those standing on the front lines of this struggle, with Al-Quds and its liberation at the heart.

As Imam Khomeini stated when declaring Al-Quds Day:

"Al-Quds Day is an international day and is not exclusive to Quds. It is the day when the oppressed confront the arrogant."

Today, al-Quds itself remains under siege. For the past 13 days, amid the holy month of Ramadan, the Zionist occupation has forcibly closed Al-Aqsa Mosque, as its officials and settlers make no secret of their demands for its destruction. Palestinians in Jerusalem face relentless ethnic cleansing and displacement as the occupation attempts to erase the Palestinian identity of the city – the eternal capital of Palestine. Every night, occupation forces invade homes and abduct dozens of Palestinians, even as settlers rampage and kill in the villages of the West Bank in a drive to steal even more Palestinian land. More than 9,500 Palestinian prisoners remain held in Zionist prisons under brutal and torturous conditions.

The imprisoned Palestinians are at the heart of the struggle for liberation. Their steadfastness embodies the spirit of resistance that Al-Quds Day represents. Imam Sayyed Ali Khamenei himself said, when speaking about Al-Quds Day, in a special appeal about the prisoners, “Commemorate al-Quds Day and if world propaganda does not broadcast it, it does not matter. The prisoner behind the walls of the prisons in Occupied Palestine must not feel lonely to resist. Those men and women who are attacked by Zionists in alleys and streets of Jerusalem, the Gaza Strip, and other cities of Occupied Palestine need to feel that you support them in resistance.”

The Zionist regime seeks to escape accountability for these crimes. Yet around the world, more people than ever recognize the reality of Zionism as a colonial project that must be dismantled. In cities across the globe and in the heart of the imperial core, including New York, Toronto, London, Paris and Berlin, people are mobilize to demand an end to the aggression on Iran, Lebanon and the region, an arms embargo on the Zionist regime, the liberation of Palestinian prisoners, and the freedom of Palestine from the river to the sea.

It is precisely because Al-Quds Day expresses this global unity and resistance that governments across Europe and the imperial core attempt to suppress it. Authorities in Britain have banned the Al-Quds Day march in London, while Germany has banned Al-Quds Day mobilizations in Berlin for years. In fact, it was the first of the major mobilizations for Palestine – followed shortly thereafter by Al-Nakba Day and Palestinian Prisoners’ Day – to be banned in Berlin. In Canada, Zionist organizations and the Ontario government are attempting to ban the massive Al-Quds Day protests in Toronto, which bring out thousands annually. These bans expose these Western imperialist governments that claim to defend freedom while repressing solidarity with Palestine. In fact, as they make clear their imperial solidarity with unlimited Zionist aggression on the region and genocide in occupied Palestine, they want to silence the call of Al-Quds Day: that Palestine can and will be free of Zionism and the entire region can and will be free of imperialism.

On this International Al-Quds Day, Samidoun Palestinian Prisoner Solidarity Network calls on people everywhere to mobilize, organize and escalate their solidarity with Palestine and the

prisoners, to stand with the forces confronting Zionism and imperialism, and to continue marching on the road to liberation of Al-Quds and the victory of Palestine.

Al-Quds will be liberated. Palestine will be free – from the river to the sea.

Posters being used by Plate-forme Charleroi-Palestine (French):

- https://samidoun.net/wp-content/uploads/2026/03/affiche_a3_soutien-iran-pal-liban.pdf
- https://samidoun.net/wp-content/uploads/2026/03/affiche-a3_contre-guerre-iran_b.pdf

Join the demonstrations and mobilizations (send yours to samidoun@samidoun.net to be added to this list):

Massive demonstrations are being organized in Pakistan, Kashmir, Yemen, and in cities throughout Iran; we do not have precise time and location information but will share all reports.

Note: In the United States, the Unified National Antiwar Coalition is maintaining a list at <https://unac.notowar.net/al-quds-day-solidarity-actions-with-palestine-and-iran/>

New York City:

Friday, March 13

3:30 pm

Times Square (42nd and Broadway)

Info: <https://www.instagram.com/p/DVzHg1dESBX/>

Seattle:

Friday, March 13

4:30 pm

Victor Steinbreuck Park

Info: <https://www.instagram.com/p/DVwbARVEirY/>

Vancouver:

Friday, March 13

4:30 pm

Grandview Park

Info: <https://www.instagram.com/p/DVtdY2FDgb7/>

Toronto:

Saturday, March 14

3 pm

US Consulate, 360 University Ave

Info: <https://www.instagram.com/p/DVtf9M1kRZ4/>

Montreal:

Friday, March 13

6 pm

Place Norman-Bethune Town Sq.

Info: <https://www.instagram.com/p/DVpMkOJkXkX/>

Saturday, March 14

2 pm

Zionist Consulate, 1 Westmount Square

Info: <https://www.instagram.com/p/DVG0PZcDiBH/>

London:

Sunday, 15 March

1 pm

Home Office, 2 Marsham St, Westminster

NOTE: Despite the march ban, a stationary protest at least will take place and the organizers are waging an urgent legal battle.

Details: <https://www.ihrc.org.uk/al-quds-day-2026/>

Dallas:

Friday, 13 March

1:45 pm – Jummah Prayer

3:00 pm – Rally

The Grassy Knoll

Info: <https://www.instagram.com/p/DVE0fYfkQ6d/>

Houston:

Friday, 13 March

3:30 pm

Westheimer and Post Oak

Info: <https://www.instagram.com/p/DVclW80ju5C/>

Charleroi:

Friday, 13 March

5 pm (17h)

Pont devant la gare de Charleroi-Central

Info: <https://www.instagram.com/p/DV0Fy30gju4/>

Brussels:

Sunday, 15 March

2 pm (14h)

European Parliament – Place du Luxembourg

Stockholm:

Friday, 13 March

3:30 pm (15h30)

Zionist Embassy, Stockholm

Saturday, 14 March

1 pm (13h)

Medborgarplatsen to Slussen

Info: <https://www.instagram.com/p/DVytXYOchwQ/>

Gothenburg:

Friday, 13 March

4 pm (16h)

Brunnsparken to Centralstation

Washington, DC:

Saturday, 14 March

12 pm

White House

Info: <https://www.instagram.com/p/DVynwt5jjLj/>

Chicago:

Friday, 13 March

4 pm

Consulate General of "Israel", 500 W Madison St
Info: <https://www.instagram.com/p/DVhfBNICn53/>

Paterson, NJ:

Friday, 13 March
3 pm
Little Palestine, Main St, 76 Gould Avenue
Info: <https://www.instagram.com/p/DVzoU-wj50w/>

Paris:

Saturday, 14 March
2 pm (14h)
Place de la Nation
Info: <https://www.instagram.com/p/DVvSxhsCIGV/>

Ottawa:

Friday, 13 March
3 pm
50 O'Connor St, Ottawa
Info: <https://www.instagram.com/p/DVyP1L5jhVF/>

Portland:

Sunday, 15 March
3 pm
Sewallcrest Park, 1715 SE 32nd Place
Info: <https://www.instagram.com/p/DVuPo8uj5Ls/>

Minneapolis:

Friday, 13 March
8 pm (Candlelight Vigil for Minab School Massacre Victims)
Whittier Park
Info: <https://www.instagram.com/p/DVvr6S7ERIV/>

Sunday, 15 March
1:30 pm

28 University Ave SE

Info: <https://www.instagram.com/p/DVy2P3tDpww/>

Detroit:

Sunday, 15 March

3 pm

Spirit of Detroit

Info: <https://www.instagram.com/p/DVyyqi2iYnP/>

Rosario, Argentina:

Friday, 13 March

6 pm (18h)

Aula 12ER – Facultad de Humanidades y Artes/UNR

Info: <https://www.instagram.com/p/DVmhxYkj-f5/>

Caracas, Venezuela:

Friday, 13 March

4 pm

Plaza Bolivar, Caracas

Urgent call to act against the U.S.-Zionist aggression: Stand with Iran, stand with Palestine

27 February 2026

This is Exhibit “3” referred to in the Affidavit of Kenneth Weatherill, affirmed at the City of Toronto, in the Province of Ontario, before me on March 14, 2026, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)

 Salman Sima

All

Reels

Photos

Events



Salman Sima

1d · 

All hands on deck. Let's stand united against terrorism. Our politicians at every level of government are spineless. Our police seem to be in bed with jihadists. And the mayor has said it's okay to celebrate terrorism. It is up to us. It is our civic duty. We the people will hold the line against Al-Quds Day. Al-Quds Day is foreign interference in our democracy, created by Khomeini, the founder of the Islamic Republic regime. The same regime that massacred tens of thousands of Iranians just a few weeks ago. The same regime that deliberately shot down Flight PS752, killing 55 Canadians in an act of terror. We will show these incompetent and cowardly politicians that the power of the people is greater than the people in power. See you all!

Saturday, March 14, 2026, 3:00 PM - 4:30 PM

In front of the U.S. Consulate General Toronto, 360 University Ave, ON M5G 1S4

United Against Terrorism in Canada

- ▶ **Kick the IRGC Terrorists Out**
- ▶ **Ban the Muslim Brotherhood**
- ▶ **Crackdown on Narco-terrorism**

 Follow Message

All

Reels

Photos

Events



Salman Sima

6h ·



هوشمندانہ علیہ مزدوران جمهوری اسلامی در تورنتو مبارزہ خواہیم کرد۔ نقشہ پلیدشان را در روز قدس بر ہم خواہیم زد۔
See more...

We will fight smartly against the mercenaries of the Islamic Republic in Toronto. We will dismantle their evil plan on the day of Jerusalem. We are the children of Cyrus the Great.

#جاوید_شاہ

The promise of a visit:

Saturday, March 14, 2026, 3:00-4:30pm

In front of the U.S. Consulate General Toronto, 360 University Ave, ON M5G 1S4

[Rate this translation](#)

هوشمندانہ علیہ مزدوران رژیم در تورنتو

Follow

Message





United Against Terrorism in Canada

- ▶ Kick the IRGC Terrorists Out
- ▶ Ban the Muslim Brotherhood
- ▶ Crackdown on Narco-terrorism



Saturday, **March 14, 2026**
 3:00PM - 4:30PM

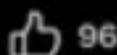
In front of the U.S. Consulate
 General Toronto, 360 University
 Ave, ON M5G 1S4



Salman Sima

1d ·

All hands on deck. Let's stand united against terroris... See more



96



11



15





United Against Terrorism in Canada

- Kick the IRGC Terrorists Out
- Ban the Muslim Brotherhood
- Crackdown on Narco-terrorism



Salman Sima

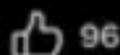
1d · 🌐

Al Quds Toronto

All hands on deck. Let's stand united against terrorism. Our politicians at every level of government are spineless. Our police seem to be in bed with jihadists. And the mayor has said it's okay to celebrate terrorism. It is up to us. It is our civic duty. We the people will hold the line against Al-Quds Day. Al-Quds Day is foreign interference in our democracy, created by Khomeini, the founder of the Islamic Republic regime. The same regime that massacred tens of thousands of Iranians just a few weeks ago. The same regime that deliberately shot down Flight PS752, killing 55 Canadians in an act of terror. We will show these incompetent and cowardly politicians that the power of the people is greater than the people in power. See you all!

Saturday, March 14, 2026, 3:00 PM - 4:30 PM

In front of the U.S. Consulate General Toronto, 360 University Ave, ON M5G 1S4



96



11



15



This is Exhibit "4" referred to in the Affidavit of Kenneth Weatherill, affirmed at the City of Toronto, in the Province of Ontario, before me on March 14, 2026, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)



METROPOLITAN
POLICE

Update



NEWS -10 MARCH 2026 23:51

Statement on Al Quds march

Assistant Commissioner Ade Adelekan, Public Order lead, said:

The Home Secretary has consented to the Metropolitan Police banning Sunday's Al Quds march and any associated counter-protest marches. This will be in place from 16:00hrs on Wednesday, 11 March and last one month.

The Al Quds march is uniquely contentious having originated in Iran and in London is organised by the Islamic Human Rights Commission, an organisation supportive of the Iranian regime and was due to take place on Sunday, 15 March.

The threshold to ban a protest is high and we do not take this decision lightly; this is the first time we have used this power since 2012.

The Metropolitan Police routinely polices hundreds of protests which have counter protesters. Free speech and the right to protest are protected in law and we have a proven track record of upholding these values. The Met has safely policed hundreds of protests from across the political spectrum including 32 major pro-Palestinian protests and many more both pro and anti the Iranian regime. Where those protests present risks, they can normally be managed by the police placing conditions under our Public Order Act powers – this can include directing the timing, route and duration of a procession.

But in our assessment this march raises unique risks and challenges. We must consider the likely high numbers of protestors and counter protestors coming together and the extreme tensions between different factions. We have taken into consideration the likely impact on protests of the volatile situation in the Middle East, with the Iranian regime attacking British allies and military bases overseas.

We must also consider that the security services have been publicly clear about the threats we are facing on UK soil from the Iranian regime. In the last year MI5 and Counter Terrorism Policing have foiled over 20 Iranian state-backed attacks on the UK. Last week counter-terrorism officers arrested four people under the National Security Act after they allegedly spied on Jewish communities for the Iranian regime and, separately, at the weekend a man was reportedly stabbed by someone who had opposing views on the Iranian regime.

Overall, the context is so uniquely complex and the risks are so severe that placing conditions on the protest will not be sufficient to prevent it from resulting in serious public disorder - running the risk of injury to members of the public, protestors, police officers and damage to property.

Previous Al Quds marches have resulted in arrests for supporting terrorist organisations and antisemitic hate crimes. However, the decision to ban it this year is purely based on a risk assessment of this specific protest and counter-protests – we

do not police taste or decency or prefer one political view over another, but we will do everything we can to reduce violence and disorder.

We know events across the globe have an impact on London and we have been engaging with representatives from our Jewish and Muslim communities as well as Iranians. This engagement will continue into the weekend.

While we will protect the right to protest, those who crossover into criminality will face the full force of the law. Even with the ban in place, we will face a challenging, potentially violent weekend and will be supported by officers from around the country. There will be an increased police presence in the area and officers will take robust action as needed.

We are immensely grateful for their continued exceptional public order policing at a time of relentless events within an incredibly complicated political environment. Anyone who attempts to form or join a march or incite others to will be committing a criminal offence and should expect arrest.

There is no law or power to ban a static assembly, which is different from a moving protest march. Given the concerns around serious disorder, we will place strict conditions on any static assembly. These are steps to mitigate those risks and we cannot guarantee they reduce the risk of disorder to zero. Given the tensions, we have to accept that confrontations could still take place.

We urge the organisers to comply with our conditions or face arrest.

Topics

[Police matters](#)

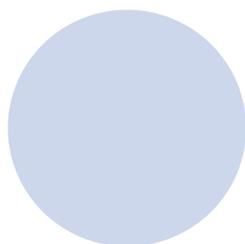
Categories

[The Met central London](#)

Regions

London

Contacts



Newsdesk

Newsdesk@met.police.uk



METROPOLITAN
POLICE

Update

NEW
SCOTLAND
YARD

Update MyNewsDesk Header image26 (1).jpg



This is Exhibit "5" referred to in the Affidavit of Kenneth Weatherill, affirmed at the City of Toronto, in the Province of Ontario, before me on March 14, 2026, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits (or as may be)



METROPOLITAN
POLICE

Update



NEWS -13 MARCH 2026 14:15

Public order update

Conditions have been imposed on the Al Quds day protest and counter-protest in London this weekend (Sunday, 15 March).

Following consent from the Home Secretary, marches for both protests have been banned. As there is no law banning static protests, these will go ahead.

This is a limited and specific ban; it will apply to Al Quds day protests and those countering. This ban will be in place for one month.

The Met's assessment is that a static protest will be easier to police and prevent the two sides from coming together. While this reduces the risk, we cannot completely rule it out.

Those taking part in the Al Quds day protest must assemble on Albert Embankment, on the south side of the river Thames.

The counter-protest must assemble on Millbank, the north side of the river Thames.

Both protests will take place between Lambeth and Vauxhall bridges, with Lambeth being closed to all apart from emergency vehicles. A police presence will remain around Vauxhall.

Both groups must not gather before 13:00hrs and must disperse by 15:00hrs.

Anyone who marches or incites other to march will face arrest.

Assistant Commissioner Ade Adelekan, Public Order lead said:

“We did not take the decision to ban the marches lightly, this is a unique set of circumstances and it was our assessment that the risk of public disorder was so severe, we did not have any other choice.

“I want to be clear this decision does not set a precedent. We haven’t used this power since 2012 and we will continue to consider each and every protest on a case-by-case basis. As we have seen we can manage these through the use of conditions to keep people safe. That wasn’t the case with the Al Quds march and counter-march.

“I expect we will still face a difficult public order weekend, we have resources from across country to help officers. We will also continue to have a visible police presence around places of worship, community venues and embassies. I am thankful to all officers who will be out at the weekend keeping London safe.”

Officers on the ground will act decisively and be briefed on placards, flags and chanting that will cross the line into hate crime or support of a proscribed

organisation.

As set out previously, we will also take action where we see chants calling for intifada. We know these words have consequences.

Topics

[Police matters](#)

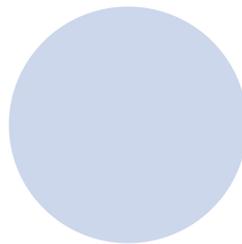
Categories

[The Met](#) [Westminster](#) [central London](#)

Regions

[London](#)

Contacts



Newsdesk

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METROPOLITAN
POLICE

Update



NEW
SCOTLAND
YARD

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Counter protest





Al Quds



**ONTARIO
SUPERIOR COURT OF JUSTICE**

THE HONOURABLE)
)
JUSTICE) THE
) DAY OF, 2026

B E T W E E N:

(Court Seal)

THE ATTORNEY GENERAL OF ONTARIO

Applicant

and

JOHN DOE, JANE DOE, LOGAN DOE and PERSONS UNKNOWN
ORGANIZED OR PARTICIPATING IN THE AL-QUDS COMMITTEE, THE
PALESTINIAN YOUTH MOVEMENT, LEBANESE4PALESTINE and
SAMIDOUN

Respondents

ORDER

THIS APPLICATION, made by the Applicant for an interim interlocutory injunction pursuant to section 101 of the *Courts of Justice Act*, and Rule 40.01 of the *Rules of Civil Procedure*, was heard this day, at 330 University Avenue, Toronto ON M5G 1R7,

UPON READING the Motion Record of the Applicant dated March 14, 2026 and upon hearing the submissions of counsel for the Applicant, in attendance,

1. THIS COURT ORDERS that the time for service, filing and confirmation of the Notice of Motion and the Motion Record is hereby abridged so that this Motion is properly returnable today.

2. THIS COURT ORDERS that an interlocutory injunction is granted, effective March 14, 2026 at 3:00 p.m. pursuant to section 101 of the *Courts of Justice Act* and Rule 40.01 of the *Rules of Civil Procedure*.

3. THIS COURT ORDERS that the Respondents and each of them, and any and all persons having knowledge of this Order, be and hereby are restrained and enjoined from directly or indirectly, by any means whatsoever, engaging in an Al-Quds Day protest in the City of Toronto, on March 14, 2026, or on any other day.

4. THIS COURT ORDERS that any police officer with the Toronto Police Service, the Ontario Provincial Police, and any other police authority (the "Police"), shall have authorization 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.

5. THIS COURT ORDERS that the Police shall have authorization to remove any vehicles, personal property, equipment, structures, or other objects that impede or block access to public roadways in the City of Toronto.

6. THIS COURT ORDERS that the Police shall retain discretion as to the timing and manner of enforcement of this Order, and specifically retain discretion:

- (a) as to the timing and manner of arrest and removal of any person pursuant to this Order;

- (b) to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening, or has contravened, any provision of this Order, upon that person agreeing to abide by this Order; and
- (c) to lay any charges or take any other lawful action.

7. THIS COURT ORDERS that any police service or peace officer who arrests or arrests and removes any person pursuant to this Order be authorized to:

- (a) release that person from arrest upon that person agreeing in writing to abide by this Order and to appear before this Court at such time and place as may be fixed for the purpose of being proceeded against for contempt of Court or fixing a date for such proceeding;
- (b) where such person has refused to give a written undertaking to abide by this Order or to appear before this Court, or where in the circumstances the peace officer considers it appropriate, to bring forthwith such person before this Court in Toronto, Ontario, or such other place as the Court may direct, for the purpose of being proceeded against for contempt of Court or for fixing a date for such proceeding; or
- (c) detain such person in custody until such time as it is possible to bring that person before this Court.

8. THIS COURT ORDERS that notice of this Order shall be given in the following manners:

- (a) to counsel for any person or party appearing at this motion;

- (b) by the creation of a URL whereby this Order can be viewed and downloaded, with the Attorney General of Ontario issuing press releases containing the URL linking to the Order;
- (c) by posting copies of this Order in or around the City of Toronto;
- (d) by reading the Order to any person, including but not limited to reading the Order over an amplification system;
- (e) by publishing this Order online; and
- (f) any other manner deemed appropriate by the parties or the Police.

9. THIS COURT ORDERS that the Notice of Application is hereby issued, and the time for service of the Notice of Application and the materials filed in support of the application is abridged.

10. THIS COURT ORDERS that the Respondents and anyone with notice of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects such person, but anyone wishing to do so shall provide the Applicant's solicitors with at least twenty-four (24) hours notice thereof, and no such motion shall in any way excuse that person from compliance with the terms of this Order.

Date of issuance

(Signature of judge, officer or registrar)

THE ATTORNEY GENERAL OF ONTARIO
Applicant

-and- JOHN DOE et al.
Respondents

Court File No.

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT TORONTO

ORDER

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Lawyers for the Applicant

**ONTARIO
SUPERIOR COURT OF JUSTICE**

THE HONOURABLE)
)
JUSTICE) THE
) DAY OF, 2026

B E T W E E N:

(Court Seal)

THE ATTORNEY GENERAL OF ONTARIO

Applicant

and

JOHN DOE, JANE DOE, LOGAN DOE and PERSONS UNKNOWN
ORGANIZED OR PARTICIPATING IN THE AL-QUDS COMMITTEE, THE
PALESTINIAN YOUTH MOVEMENT, LEBANESE4PALESTINE and
SAMIDOUN

Respondents

ORDER

THIS APPLICATION, made by the Applicant for an interim interlocutory injunction pursuant to section 101 of the *Courts of Justice Act*, and Rule 40.01 of the *Rules of Civil Procedure*, was heard this day, at 330 University Avenue, Toronto ON M5G 1R7,

UPON READING the Motion Record of the Applicant dated March 14, 2026 and upon hearing the submissions of counsel for the Applicant, in attendance,

1. THIS COURT ORDERS that the time for service, filing and confirmation of the Notice of Motion and the Motion Record is hereby abridged so that this Motion is properly returnable today.

2. THIS COURT ORDERS that an interlocutory injunction is granted, effective March 14, 2026 at 3:00 p.m. pursuant to section 101 of the *Courts of Justice Act* and Rule 40.01 of the *Rules of Civil Procedure*.

3. THIS COURT ORDERS that the Respondents and each of them, and any and all persons having knowledge of this Order, be and hereby are restrained and enjoined from directly or indirectly, by any means whatsoever, while engaging in an Al-Quds Day protest in the City of Toronto, on March 14, 2026, or on any other day, from:

- (a) watching, besetting or picketing, physically preventing, impeding, restricting or in any way physically interfering with, or counselling others to watch, beset or picket, impede, restrict or in any way physically interfere with access to the United States Consulate General located at 360 University Avenue, Toronto, Ontario;
- (b) damaging or destroying any property, utilities, or other infrastructure at the United States Consulate General;
- (c) physically preventing, impeding, restricting or in any way physically interfering with, or counselling others to impede, restrict or in any way physically interfere with access to residences, commercial premises, businesses, or other property in the City of Toronto, including but not limited to Mount Sinai Hospital;
- (d) causing or attempting to create a public nuisance within 100 meters of the locations listed in paragraphs (i) and (ii) above;
- (e) engaging in or attempting to engage in speech that constitutes hate speech under the *Canadian Charter of Rights and Freedoms*;

- (f) engaging in or attempting to engage in violence;
- (g) engaging in unlawful assembly, mischief, intimidation rioting, nuisance, or the creation of a disturbance within the meaning of sections 63, 64, 175, 180, 423, and 430 of the *Criminal Code*.

4. THIS COURT ORDERS that the Respondents and each of them, and any and all persons having knowledge of this Order, be and hereby are restrained and enjoined from directly or indirectly, by any means whatsoever,

- (a) engaging in or attempting to engage in speech that constitutes hate speech under the Canadian Charter of Rights and Freedoms;
- (b) engaging in or attempting to engage in violence;
- (c) engaging in unlawful assembly, mischief, intimidation rioting, nuisance, or the creation of a disturbance within the meaning of sections 63, 64, 175, 180, 423, and 430 of the *Criminal Code*; or
- (d) engaging in conduct that breaches any lawful direction of the Toronto Police Service;

while engaging in an Al-Quds Day protest in the City of Toronto, on March 14, 2026, or on any other day.

5. THIS COURT ORDERS that any police officer with the Toronto Police Service, the Ontario Provincial Police, and any other police authority (the “Police”), shall have authorization 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.

6. THIS COURT ORDERS that the Police shall have authorization to remove any vehicles, personal property, equipment, structures, or other objects that impede or block access to public roadways in the City of Toronto.

7. THIS COURT ORDERS that the Police shall retain discretion as to the timing and manner of enforcement of this Order, and specifically retain discretion:

- (a) as to the timing and manner of arrest and removal of any person pursuant to this Order;
- (b) to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening, or has contravened, any provision of this Order, upon that person agreeing to abide by this Order; and
- (c) to lay any charges or take any other lawful action.

8. THIS COURT ORDERS that any police service or peace officer who arrests or arrests and removes any person pursuant to this Order be authorized to:

- (a) release that person from arrest upon that person agreeing in writing to abide by this Order and to appear before this Court at such time and place as may be fixed for the purpose of being proceeded against for contempt of Court or fixing a date for such proceeding;

- (b) where such person has refused to give a written undertaking to abide by this Order or to appear before this Court, or where in the circumstances the peace officer considers it appropriate, to bring forthwith such person before this Court in Toronto, Ontario, or such other place as the Court may direct, for the purpose of being proceeded against for contempt of Court or for fixing a date for such proceeding; or
 - (c) detain such person in custody until such time as it is possible to bring that person before this Court.
9. THIS COURT ORDERS that notice of this Order shall be given in the following manners:
- (a) to counsel for any person or party appearing at this motion;
 - (b) by the creation of a URL whereby this Order can be viewed and downloaded, with the Attorney General of Ontario issuing press releases containing the URL linking to the Order;
 - (c) by posting copies of this Order in or around the City of Toronto;
 - (d) by reading the Order to any person, including but not limited to reading the Order over an amplification system;
 - (e) by publishing this Order online; and
 - (f) any other manner deemed appropriate by the parties or the Police.
10. THIS COURT ORDERS that the Notice of Application is hereby issued, and the time for service of the Notice of Application and the materials filed in support of the application is abridged.

11. THIS COURT ORDERS that the Respondents and anyone with notice of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects such person, but anyone wishing to do so shall provide the Applicant's solicitors with at least twenty-four (24) hours notice thereof, and no such motion shall in any way excuse that person from compliance with the terms of this Order.

Date of issuance

(Signature of judge, officer or registrar)

THE ATTORNEY GENERAL OF ONTARIO
Applicant

-and- JOHN DOE et al.
Respondents

Court File No.

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT TORONTO

ORDER

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Lawyers for the Applicant

**ONTARIO
SUPERIOR COURT OF JUSTICE**

CHIEF JUSTICE GEOFFREY B. MORAWETZ)
)
) FRIDAY, THE 11TH DAY
) OF FEBRUARY, 2022

B E T W E E N:

AUTOMOTIVE PARTS MANUFACTURERS' ASSOCIATION

Plaintiff/
Moving Party

- and -

JIM BOAK, JOANNE CALLAWAY, HILDA FISHER,
LORI INVERARITY, LEO LUCIO, GIL PONTE, MANBAE SINGH-GALL
DARLENE THOMPSON and JOHN DOE

Defendants/
Responding Parties

- and -

THE CORPORATION OF THE CITY OF WINDSOR,
ATTORNEY GENERAL FOR ONTARIO

Interveners

ORDER

THIS MOTION, made by the Plaintiff for an interim interlocutory injunction pursuant to section 101 of the *Courts of Justice Act*, Rule 40.01 of the *Rules of Civil Procedure*, and section 440 of the *Municipal Act, 2001*, was heard at Windsor on February 11, 2022 by videoconference.

UPON READING the Affidavits contained within the Motion Record of the Plaintiff dated February 10, 2022, the Supplementary Motion Record of the Plaintiff dated February 11, 2022, and the Motion Record of The Corporation of the City of Windsor dated February 11, 2022,



the Affidavit of Jason Bellaire sworn February 11, 2022, the Affidavit of Jason Ward Reynar sworn February 11, 2022, the Affidavit of Adam Blake-Gallipeau sworn February 11, 2022, and the Affidavit of Dr. Clifford Rosen sworn February 11, 2022, and upon hearing oral arguments of counsel for the Automotive Parts Manufacturers' Association, The Corporation of the City of Windsor, the Attorney General of Ontario, The Democracy Fund, John Doe, and with Kristian Langenfield making oral arguments on behalf of himself, with no one attending for the Defendants or any other any person having an interest in this matter, although duly served in accordance with the Endorsement of this Court dated February 11, 2022.

1. **THIS COURT ORDERS** that the time for service, filing and confirmation of the Notice of Motion and the Motion Record is hereby abridged so that this Motion is properly returnable today.

2. **THIS COURT ORDERS** that the Plaintiff is authorized to bring this Motion and the underlying proposed proceeding on behalf of all members of the Automotive Parts Manufacturers' Association pursuant to Rule 10.01(1)(f) of the *Rules of Civil Procedure*.

3. **THIS COURT ORDERS** that an interim interlocutory injunction is granted, effective February 11, 2022, at 7:00 PM, pursuant to section 101 of the *Courts of Justice Act*, Rule 40.01 of the *Rules of Civil Procedure* and section 440 of the *Municipal Act, 2001*.

4. **THIS COURT ORDERS** that the Defendants and any persons having notice of this Order are hereby restrained and enjoined from impeding or blocking access to the Ambassador Bridge

and indirect or direct approaching roadways and access points for ten (10) days from the date of this Order.

5. **THIS COURT ORDERS** that any police officer with the Windsor Police Service, the Ontario Provincial Police, and any other police authority (the “Police”), shall have authorization 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.

6. **THIS COURT ORDERS** that the Police or designated agents shall have authorization to remove any vehicles, personal property, equipment, structures, or other objects that impede or block access to the Ambassador Bridge and approaching roadways.

7. **THIS COURT ORDERS** that the Police shall retain discretion:

- a. as to the timing and manner of enforcement of this Order, and specifically retained discretion as to the timing and manner of arrest and removal of any person pursuant to this Order;
- b. to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening, or has contravened, any provision of this Order, upon that person agreeing to abide by this Order; and
- c. and to lay any charges or take any other lawful action.

8. **THIS COURT ORDERS** that any peace officer and any member of the Police who arrests or arrests and removes any person pursuant to this Order shall have authorization to release that person from arrest upon that person agreeing in writing to obey this Order

9. **THIS COURT ORDERS** that the Defendants and other persons remain at liberty to engage in a peaceful, lawful and safe protest, that does not impede or block access to the Ambassador Bridge and approaching roadways. For greater certainty, the terms of this Order and any applicable law must be complied with.

10. **THIS COURT ORDERS** that notice of this Order shall be given by the creation of a URL whereby this Order can be viewed and downloaded, with the Plaintiff, The Corporation of the City of Windsor, and the Attorney General of Ontario issuing press releases containing the URL linking to the Order and the date, time and location of the hearing date contemplated in paragraph 14 of this Order.

11. **THIS COURT ORDERS** that notice of this Order may be given in the following manners:

- a. by posting copies of this Order in or around the City of Windsor;
- b. reading the Order to any person, including but not limited to reading the Order over an amplification system;
- c. publishing this Order online; and
- d. any other manner deemed appropriate by the parties or the Police.

12. **THIS COURT ORDERS** that this Order shall not apply to persons acting in the course of or in the exercise of a statutory duty, power or authority.

13. **THIS COURT ORDERS** that costs of this Motion shall be in the cause, subject to the Orders granting the interveners standing.

14. **THIS COURT ORDERS** that the parties and any person having an interest in this matter shall appear before the Court in Windsor by videoconference on February 18, 2022 at 10:00 am for the hearing of a motion to continue this Order.



CHIEF JUSTICE GEOFFREY B. MORAWETZ

AUTOMOTIVE PARTS MANUFACTURERS' ASSOCIATION

v.

JIM BOAK et al

**ONTARIO
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT WINDSOR

ORDER

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Windsor, Ontario N9A 6Z9

LAWYERS FOR THE PLAINTIFF

Our File: 80695



Court File No. CV-24-00720977-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

THE HONOURABLE)
JUSTICE KOEHNEN)
TUESDAY THE 2nd
DAY OF JULY 2024

BETWEEN THE GOVERNING COUNCIL OF THE UNIVERSITY OF TORONTO
(Court Seal) Applicant

and

JOHN DOE, JANE DOE, TAYLOR DOE, PERSONS UNKNOWN, ABDURRAHEEM
DESAI, AVIRAL DHAMIJA, ERIN MACKEY, HEIGO PARSA, KABIR SINGH,
KALLIOPE ANVAR MCCALL, MOHAMMAD YASSIN, SARA RASIKH, SERENE PAUL
and SAIT SIMSEK MURAT
Respondents

ORDER

THIS MOTION, made by the Applicant for an interim interlocutory injunction pursuant to section 101 of the *Courts of Justice Act*, and Rule 40.01 of the *Rules of Civil Procedure*, was heard on June 19 and 20, 2024 at 361 University Avenue, Toronto ON M5G 1R7, with further written submissions received on June 24, 2024 and with judgment being reserved to this day,

UPON READING the Motion Records of the Applicant and the Respondents and upon hearing the submissions of counsel for the Applicant, and the Respondents, and upon reading the factums of the Applicant, the Respondents and the Intervenors,

-2-

1. THIS COURT ORDERS that the time for service, filing and confirmation of the Notice of Motion and the Motion Record is hereby abridged so that this Motion is properly returnable today.
2. THIS COURT ORDERS that an interlocutory injunction is granted, effective July 2 , 2024 at
● 4:30 p.m. pursuant to section 101 of the *Courts of Justice Act* and Rule 40.01 of the *Rules of Civil Procedure*.
3. THIS COURT ORDERS that the Respondents and each of them, and any and all persons having knowledge of this Order, no later than 6 pm on July 3, 2024 shall remove any and all structures, tents, encampments, and items of personal property placed or created or imposed by them at Front Campus and King's College Circle and shall permit the Applicant to have full use and enjoyments of its lands, premises and facilities at Front Campus and King's College Circle.
4. THIS COURT ORDERS that the Respondents and each of them, and any and all persons having knowledge of this Order, shall no later than 6 pm on July 3, 2024 vacate Front Campus and King's College Circle at the University of Toronto.
5. THIS COURT ORDERS that the Respondents and each of them, and any and all persons having knowledge of this Order, be and hereby are restrained and enjoined from directly or indirectly, by any means whatsoever:
 - (a) physically preventing, impeding, restricting or in any way physically interfering with, or counselling others to impede, restrict or in any way physically interfere with access to University property, including Front Campus, King's College Circle and 93 Highland Avenue;

-3-

- (b) physically preventing, impeding, restricting or in any way physically interfering with, or counselling others to prevent, impede, restrict or in any way physically interfere with the removal of any objects or structures including fences, barriers, tents, encampments or personal property from Front Campus and King's College Circle;
- (c) erecting any fences, tents, structures or barriers of any type on University property, including Front Campus, King's College Circle and 93 Highland Avenue; and
- (d) using, entering or gathering at Front Campus or King's College Circle without the consent and authorization of the Applicant between the hours of 11 p.m. and 7 a.m.

6. THIS COURT ORDERS that any police officer with the Toronto Police Service, the Ontario Provincial Police, and any other police authority (the "Police"), shall have authorization 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.

7. THIS COURT ORDERS that University of Toronto officials and their designated agents shall have authorization to remove any objects or structures including fences, barriers, tents, encampments, or personal property from King's College Circle, and that the Police or their designated agents shall have authorization to render any assistance necessary, including to prevent anyone from interfering with the execution of the Order.

8. THIS COURT ORDERS that the Police shall retain discretion:

-4-

- (a) 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;
- (b) to detain and release any person without arrest who the Police have reasonable and probable grounds to believe is contravening, or has contravened, any provision of this Order, upon that person agreeing to abide by this Order; and
- (c) to lay any charges or take any other lawful action.

9. THIS COURT ORDERS that any police service or peace officer who arrests or arrests and removes any person pursuant to this Order be authorized to:

- (a) release that person from arrest upon that person agreeing in writing to abide by this Order and to appear before this Court at such time and place as may be fixed for the purpose of being proceeded against for contempt of Court or fixing a date for such proceeding;
- (b) where such person has refused to give a written undertaking to abide by this Order or to appear before this Court, or where in the circumstances the peace officer considers it appropriate, to bring forthwith such person before this Court in Toronto, Ontario, or such other place as the Court may direct, for the purpose of being proceeded against for contempt of Court or for fixing a date for such proceeding; or

-5-

- (c) detain such person in custody until such time as it is possible to bring that person before this Court.

10. THIS COURT ORDERS that the Respondents and other persons remain at liberty to engage in peaceful, lawful and safe protests:

- (a) on public property that does not impede or block access to King's College Circle, any University of Toronto property or any approaching roadways to the University of Toronto; and
- (b) on University of Toronto property in accordance with the University of Toronto's Policy on the Disruption of Meetings, and the Policy and Procedures on the Temporary Use of Space;

For greater certainty, the terms of this Order and any applicable law must be complied with.

11. THIS COURT ORDERS that notice of this Order shall be given in the following manners:

- (a) to counsel for any person or party appearing at this motion;
- (b) by emailing to students.uoft.protest@gmail.com;
- (c) by posting a downloadable copy at www.litigate.com/UofTInjunction;
- (d) by the University of Toronto issuing a press release contain the URL linking to the Order;
- (e) by posting printed copies in or around the Front Campus and King's College Circle and other nearby University of Toronto buildings;

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- (f) by reading the Order to any person, including but not limited to reading the Order over an amplification system; and
- (g) by any other manner deemed appropriate by the parties or the Police.

12. THIS COURT ORDERS that this Order shall not apply to University of Toronto officials assisting in the enforcement of this Order or to persons acting in the course of or in the exercise of a statutory duty, power or authority.

13. THIS COURT ORDERS that the Respondents and anyone with notice of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects such person, but anyone wishing to do so shall provide the Applicant's solicitors with at least twenty-four (24) hours notice thereof, and no such motion shall in any way excuse that person from compliance with the terms of this Order.

July 2, 2024

 Digitally signed by Markus
Koehnen
Date: 2024.07.02 15:26:21
-04'00'

(Signature of judge, officer or registrar)

THE GOVERNING COUNCIL OF THE UNIVERSITY OF
TORONTO
Applicant

-and- JOHN DOE et al.

Respondents

Court File No. CV-24-00720977-0000

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT TORONTO

ORDER

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RCP-F 4C (September 1, 2024)

THE ATTORNEY GENERAL OF ONTARIO
Applicant

-and-

JOHN DOE et al.
Respondents

Court File No.

**ONTARIO
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT TORONTO

**APPLICATION RECORD OF THE ATTORNEY
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