

**TOP SECRET**

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(TD R538)**

**CSIS OPERATIONAL SUPPORT AND ITS USE OVERSEAS  
(SIRC STUDY 2013-07)**

**Security Intelligence Review Committee  
May 30, 2014**

**ATIP version**

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## 1. INTRODUCTION

The CSIS's foreign footprint post 9/11 has led the organization to focus more and more attention on the support functions necessary to run safe and effective operations abroad. The purpose of this review was to examine some of the physical, technical and planning support required for overseas operations, especially in higher risk environments.

SIRC first examined the various changes and developments to CSIS's foreign operations platforms. In this respect, CSIS has worked on improving training offered to employees, developed new policy, approvals and authorities, enhanced its capabilities and equipment to deal with critical incidents, as well as designed new operational methods specific for the unique challenges associated with operating abroad. Despite these many improvements, SIRC recommended ways in which CSIS could further enhance its foreign operational support functions.

Our review then explored in-depth one of the most exceptional foreign support measures used by CSIS – the arming of personnel. Overall, the Committee was concerned on a number of issues associated with the Service's use of firearms within dangerous environments. Broadly stated, the Committee does not believe that CSIS has approached the arming of employees beyond Afghanistan with the necessary attention to detail expected of such a serious undertaking. Most importantly, SIRC was unable to conclude whether the Minister of Public Safety was sufficiently informed regarding the expansion of the Service's armed presence beyond Afghanistan.

To this effect, SIRC made some key recommendations which we believe will help CSIS better manage its firearm program, and further, will ensure that the Minister of Public Safety is fully informed on an issue which goes to the heart of ministerial accountability over CSIS.

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## 2. METHODOLOGY AND SCOPE

This study included an extensive review of documentation, such as CSIS internal policies and procedures, training materials, planning and discussion papers, internal audits, as well as all documentation pertaining to strategic initiatives that could have an impact on foreign operational support. SIRC also examined certain operational documents, particularly those involving Dangerous Operating Environments (DOEs).

SIRC also relied on a high number of briefings to gain necessary context. SIRC met with \_\_\_\_\_ Branch,<sup>2</sup> as well as \_\_\_\_\_ representatives.<sup>3</sup> Additionally, SIRC met separately with the Heads of Station (HoS) responsible for all DOEs, to discuss various issues including the role of firearms used by Service employees.<sup>4</sup> SIRC also met with \_\_\_\_\_ to ask questions about their unique skill-sets and associated responsibilities.<sup>5</sup>

In order to provide further understanding of the operational support requirements of CSIS Stations, SIRC researchers traveled with the Executive Director to two CSIS foreign Stations \_\_\_\_\_ These visits provided unique insight into the realities of life for CSIS employees deployed abroad and helped to contextualize the challenges of running Stations halfway around the world from CSIS HQ. SIRC wishes to underscore the importance of these visits and to express gratitude to these employees for the open and candid dialogue.

In the course of the review, SIRC encountered a few difficulties.

Moreover, SIRC staff received incomplete and inconsistent answers from CSIS on a number of issues related to the firearms program. For example, when SIRC requested information

<sup>2</sup> SIRC meeting \_\_\_\_\_ August 20, 2013.

<sup>3</sup> SIRC meeting \_\_\_\_\_ August 23, 2013; SIRC meeting with \_\_\_\_\_ November 28, 2013; and SIRC meeting \_\_\_\_\_ January 14, 2014.

<sup>4</sup> SIRC meetings on February 3, 2014: \_\_\_\_\_ and, SIRC meetings on February 7, 2014: \_\_\_\_\_

<sup>5</sup> SIRC meeting \_\_\_\_\_ November 27, 2013; SIRC meeting \_\_\_\_\_ December 3, 2013.

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**Finally, SIRC believes that many of the concerns raised above could have been alleviated had it met with all relevant CSIS stakeholders earlier in the review process.** The presentation provided by CSIS's \_\_\_\_\_ for example, was thorough and should have been one of the first meetings arranged for SIRC when it began to look more closely at the firearms issue.<sup>11</sup>

The core review period for this study was January 1, 2011 to August 1, 2013, although information falling outside of this period was used to make a full assessment.

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<sup>11</sup> Although SIRC's interest in CSIS's use of firearms was specified in the August workplan, SIRC further emphasised the importance of this review angle starting in October, 2013. Refer to SIRC Memo "Information and Meeting Requests," October 24, 2014.

### 3. OPERATIONAL SUPPORT: HISTORY, CONTEXT, AND DEVELOPMENTS

CSIS has had a presence abroad since its creation, but for many years, employees stationed overseas acted chiefly to receive security intelligence from allied governments.<sup>12</sup> The evolving threat environment post 9/11 led CSIS to expand its presence and activities abroad, This development forced the deliberation of the support systems required to underpin such efforts. To this end, in 2005, was established to carefully examine and recommend options to formalize and improve foreign operations as a distinct and functional component of the Service.<sup>13</sup> Its report outlined a number of recommendations to be implemented over a five-year period.

in 2008, CSIS conducted an Internal Audit to examine whether it had implemented proper safety and security measures. The audit focussed on the protection of employees in high-risk operating environments, more specifically: the protection of personnel and assets; health and safety; training; security infrastructure; and, compensation.<sup>15</sup> Its findings were that, for the most part, proper safety and security measures had been put into place.<sup>16</sup>

SIRC examined some of the initiatives recommended in the 2005 report, as well as items outlined in the 2008 Internal Audit. These training, critical incident plans and Personal Protective Equipment, each of which is discussed below.

Planning for a foreign operation is embodied in the FOSA, which details the support

<sup>12</sup> SIRC meeting August 23, 2013.

<sup>13</sup> File Number 880-110 "Internal Audit of Protection of Employees Working Abroad in High-Risk Operating Environments".

<sup>15</sup> The "Internal Audit of Protection of Employees Working Abroad in High-Risk Operating Environments" covered the period from May 2007 to September 2008.

<sup>16</sup> the report did not represent major risks to the overall safety of personnel working abroad in high-risk environments.

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A variety of specialized courses have recently been developed which are 'tailored' to the needs of employees being sent overseas. Some of these courses include

which is given solely to employees working in DOEs. Unfortunately, SIRC learned that none of these courses are required prior to deployment.<sup>18</sup> SIRC finds this to be problematic since training is supposed to assist employees and mitigate any associated risks that they may encounter while performing and/or assisting in operations abroad. For example, SIRC learned that officers deployed to stations that are responsible for DOEs had not all received the same training:

As such, **SIRC recommends that all necessary and relevant training be made mandatory prior to an employee's deployment abroad.**

The Service recently rolled out its Critical Incident Response Plan (CIRP), which outlines the main steps to be followed in the event an employee is involved in a critical incident impacting their health and well-being.<sup>20</sup> The nature and scope of the critical incident will determine the Service's response. Included in the CIRP are annexes that can be used by branches/regions as guidelines and checklists to support rapid and

<sup>18</sup> SIRC meeting

August 20, 2013.

<sup>20</sup> CSIS Critical Incident Response Plan, File 676-23, October 2013.

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integrated responses. Despite the clear benefits of this plan, **SIRC found that not all employees posted abroad have been informed about the importance of understanding the CIRP.**<sup>21</sup> Although foreign stations are equipped to deal with the emergency situations through emergency protocols, **SIRC recommends that CSIS HQ ensures that all employees be properly informed about the CIRP and any responsibilities they have under this Plan.**

Finally, although most CSIS Stations are in relatively safe areas there has still been appropriate attention paid to further augmenting the protective support capabilities offered to employees working overseas. Known generically as Personal Protective Equipment (PPE), this refers to protective clothing, helmets, goggles or other garments or equipment designed to protect the employee's body from injury. **SIRC found that there were instances of poor planning in deploying PPE products abroad.**

**SIRC recommends that CSIS apply consistent measures to ensure that personnel stationed abroad are adequately supplied with the appropriate personal safety equipment.**

### 3.1 Recent Initiatives and Developments

Most recently, CSIS has forged ahead with further changes to its foreign collection platform, which requires additional planning and operational supports.<sup>22</sup>

<sup>21</sup> For example, SIRC met with a number of employees stationed abroad. Despite CSIS/HQ's best efforts, none of these Service officers appeared to know of the existence of the CIRP.

<sup>22</sup> Many of the issues related to CSIS's evolving footprint abroad have been examined through SIRC Study 2012-08.



SIRC believes that the support systems in place to help facilitate foreign operations are being given considerable attention by CSIS. That said, there remain some holistic challenges at Stations, as conveyed to SIRC during conversations with a number of current and former employees stationed abroad. These challenges include:

CSIS HQ has acknowledged that it is working on all of these concerns, albeit within its fiscal limitations. Some of these challenges are being addressed

SIRC will, in future, revisit this subject to assess the degree to which these initiatives have affected operational support functions.

Overall, SIRC noted that the operational support mechanisms being developed are unique given the challenges associated with working in diverse foreign environments.

The arming of Service personnel abroad, will be discussed in greater detail in the next section of this review.

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#### 4. THE EVOLUTION OF ARMED SUPPORT CAPABILITIES FOR CSIS

The catalyst for the adoption of one of CSIS's most exceptional operational support measures – the arming of Service personnel – is rooted in CSIS's entry into Afghanistan. This section provides context on how CSIS's armed support capabilities incrementally transitioned

CSIS employees have been armed within Afghanistan since 2002.<sup>26</sup> Until 2007, the arming and training of deployed CSIS personnel was the responsibility of the Canadian Forces (CF), who also ensured that all of CSIS's Afghan-related activities received Special Forces close protection. Equally significant, DFATD provided all CSIS employees in this country with diplomatic accreditation, As such, CSIS received excellent support from its Canadian military and diplomatic partners, in keeping with a whole-of-Government strategy for operating within Afghanistan.

preferred 'model' for other theatres.<sup>28</sup> In 2005, it was already being noted that would require detailed support infrastructure, one of which included the possibility of developing internal capabilities to train and arm employees.<sup>29</sup> A key precondition to putting this idea into action was the development of a policy framework. In 2007, CSIS developed its specific DOE definition owing to the belief that "unilateral operations in areas that pose a significant risk" to employee safety would have to be addressed from a policy perspective.<sup>30</sup>

In 2008, a combination of circumstance and deliberate planning led CSIS to internalize the responsibility for arming its employees.

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<sup>26</sup> The CSIS Director approved of the arming of employees under Section 117.08 of the Criminal Code: Individuals acting for a police force, Canadian Forces and visiting forces.

<sup>27</sup> This accreditation is sustained through a Technical Arrangement (TA) between the Government of Canada and the Government of Afghanistan which permits *both* the Canadian military and civilians (i.e. CSIS) to carry firearms.

<sup>30</sup> CSIS Briefing Note, "Arming of Service Personnel in Dangerous Operating Environments," October 23, 2007.

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were twofold: first, CSIS launched its own firearms program, including the development of new firearms-specific policy and training;<sup>33</sup> and second, CSIS laid the foundations for its own armed operational support team. From this period forward, CSIS employees sent to Afghanistan received the Service's firearms training modules, were guided by a series of related policies, and were equipped with CSIS weapons.

Shortly after this development, SIRC decided to undertake a review of CSIS's decision-making overseas, which included its use of firearms within Afghanistan. The Committee found that there were strong measures in place to ensure proper training, accreditation and conditions under which firearms could be used. The review did express concern that the criteria employed by the Service to determine whether or not an area should be designated as a DOE had not been clearly laid out or defined. More importantly, SIRC cautioned about CSIS's possible future decision to use firearms outside of Afghanistan:

CSIS should more fully consider the effect which arming some of its personnel may have on the internal culture and external perceptions of the organization itself. This review should include undertaking a full appreciation of how and when to engage in the use of lethal force, the evidence suggesting a correlation between the arming of state officials and the associated increased risk of their becoming a victim of lethal force, the legal implications of arming Service employees, the range of psychological and performance-altering impact which exchanges involving firearms can produce, and the altered impressions which Service allies could potentially engender once the Service arms its personnel in theatre.<sup>36</sup>

The review concluded with a recommendation that should CSIS expand its use of firearms abroad, that it be done so "in consultation with, and with the approval of, the Minister of Public Safety".<sup>37</sup> Moreover, the significance of what was transpiring within CSIS was not lost on the Committee: a civilian agency had begun to incorporate military methods within its foreign support capabilities. Three years later, this review found that this process has accelerated, outside of Afghanistan.

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<sup>33</sup> Once CSIS commenced the development of its own in-house firearms program,

<sup>36</sup> SIRC Study 2009-06, "CSIS's Decision-Making in Relation to Foreign Investigative Activities," August 4, 2010, p.20.

<sup>37</sup> SIRC Study 2009-06, "CSIS's Decision-Making in Relation to Foreign Investigative Activities," August 4, 2010, p.21.

#### 4.1 CSIS's Use of Firearms Beyond Afghanistan

The catalyst for the expansion of the Service's use of firearms beyond Afghanistan was the increased activity within DOEs.

The creation of \_\_\_\_\_ provided the impetus for the creation of more rigorous policy governing the use of firearms by Service personnel. **SIRC found that CSIS's new procedures provide improved direction to employees regarding their roles and responsibilities under the Service's firearms program,<sup>40</sup> but there appears to be a disparity between policy and its practical application by employees.**

When asked about this, CSIS responded that "the absence of this policy would leave a gap in the post-incident response and place the Service in jeopardy of not pursuing a forensic examination when feasible to do so".<sup>43</sup> SIRC nonetheless maintains that policy should be consistent with direction provided by management to employees. In addition, SIRC learned that \_\_\_\_\_ had no knowledge of CSIS's firearms policies; \_\_\_\_\_ according to CSIS policy, \_\_\_\_\_ have a number of responsibilities respecting firearms, especially following a firearms incident.<sup>44</sup>

<sup>40</sup> CSIS Procedures: Firearms became effective on August 12, 2013, replacing the former firearms policy known as SEC-306.

<sup>43</sup> ER&L Memo to SIRC, File #100-33-2 / 410-184, February 13, 2014.

<sup>44</sup> In particular, \_\_\_\_\_ this individual would be the designate \_\_\_\_\_ and therefore, has a multitude of firearms-related responsibilities. Refer to section 2.11 & 2.12 of CSIS Procedures: Firearms.



In light of these observations, SIRC wished to impress upon CSIS that it is both reasonable and necessary for CSIS firearms policy to be followed in the strictest possible terms, or be clearly written to indicate where there is latitude for interpretation.

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## 5. FIREARM PROGRAM ISSUES REQUIRING ATTENTION

In addition to the policy issues noted previously, SIRC has concerns with CSIS's firearms program that have much broader implications and consequences. In this context, SIRC would like to highlight two issues stemming from CSIS's firearms program that should be addressed to reduce potential collateral risks to the Government of Canada.

### 5.1 Firearms Management

As previously noted, in 2010, SIRC called on the Service to consider fully the consequences of utilizing firearms outside of Afghanistan. Three years later, however, this review notes that the Service has not approached the arming of employees within DOEs with the necessary attention to detail that would be expected of such a serious undertaking.<sup>48</sup> In particular, after taking an in-depth look at the management of this program – including weapons acquisition, training, transport, storage and tracking – three issues were identified which we believe require further attention by CSIS management.<sup>49</sup>

The first involves the processes used by CSIS to acquire its weapons. .

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<sup>48</sup> SIRC requested all internal reports/studies conducted to provide a baseline for enhancing CSIS's foreign operations. Refer to SIRC 2013-07 Workplan, August 1, 2013.

<sup>49</sup> Although SIRC has already commented on the various training modules available for CSIS employees being sent overseas, with respect to CSIS's firearms training, both documentation review and a visit to speak with CSIS's demonstrate that the training provided to CSIS employees is thorough: courses are taught by highly qualified personnel, with the certification process meeting or exceeding all firearm safety regulations/standards.

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Secondly, SIRC notes that although Internal Security is the policy center responsible for firearms, this Branch was unable to address many of SIRC's inquiries. For example, answers to questions were provided by multiple Branches (i.e. Internal Security or Strategic Policy), and these were often times incomplete or inconsistent.<sup>54</sup> For this reason, SIRC raises concerns about the governance framework in place to manage the firearms program, as it is fragmented along operational, security and policy business lines.

The third concern involves the legal underpinnings of CSIS's activities while armed within DOEs. To begin, the Service contends that *Canada Labour Code* obligations extend overseas, requiring CSIS to maintain employee safety in all workplace locations. This is also the justification used for the necessity of carrying firearms within DOEs. In the Committee's opinion, however, the wisdom and necessity of this decision cannot be solely substantiated by claiming that the *Canada Labour Code* requires that weapons be used to ensure employee safety in the workplace. Indeed, the implications of this decision have much greater significance, including how arming employees could affect international relations, and how CSIS's corporate culture could change over time.

Adding to this, in 2010, an internal CSIS document noted that if an employee used his/her weapon in a negligent manner (e.g. excessive force), that employee would be liable for the resulting damages.<sup>56</sup> When SIRC asked about this opinion, CSIS responded that this was not official policy.<sup>57</sup> In an effort to clarify further, CSIS cited its own policy on employee safety which states that:

The Service will ensure that its employees are properly trained in the use of force, as well as in the use of any firearm that may be issued to them. The Service will also ensure that employees are briefed on and understand all related Service firearms procedures and that these procedures are readily available to Service employees. Service employees will act in a manner consistent with the training provided to them and in accordance with all related Service firearms procedures.<sup>58</sup>

<sup>54</sup> For examples of this confusion, refer to ER&L Memo to SIRC, File #100-33-2 / 410-184, February 13, 2014.

<sup>56</sup> CSIS Document, "CSIS Firearms Policy," May 26, 2010.

<sup>57</sup> ER&L Memo to SIRC, File #100-33-2 / 410-184, February 13, 2014.

<sup>58</sup> Refer to 2.11 of CSIS Protection of Employees

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In SIRC's opinion, this policy fails to address the question of employee liability. Moreover, CSIS legal opinion provided to SIRC on this subject also fails to adequately address the context of

There is also no adequate advice on what course of legal action would be pursued domestically if an employee was believed to have acted negligently within a DOE, and consideration is not given on the extent to which can be regarded as 'defensive weapon'. Finally, there is also a lack of adequate advice on possible legal implications for Canada under international law.

**In order to improve CSIS's management of its firearms program, SIRC recommends that CSIS develop better guidelines on the sourcing and purchasing of weapons create a clear responsibility center for the firearms program and obtain updated legal advice related to the reasonableness and necessity of carrying firearms within DOEs.**

## **5.2 Ministerial Accountability**

The underpinning for requiring the use of firearms within DOEs is for CSIS to collect security intelligence that cannot be obtained elsewhere.

As mentioned, SIRC had previously recommended that any expansion of CSIS's use of firearms beyond Afghanistan involve consultation with the Minister of Public Safety. The rationale for this recommendation was rooted in Ministerial Direction, which requires the Director to report to the Minister of Public Safety, in a timely manner, when there is a potential that a CSIS activity may have significant adverse impact on Canadian interests, such as discrediting the Service or the Government of Canada and giving rise to public controversy. SIRC believes that the issue of CSIS's use of firearms outside of Afghanistan meets this threshold.

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**Our initial review was unable to conclude whether the Minister of Public Safety, as per our 2010 recommendation, had been directly consulted and engaged on the expansion of CSIS's use of firearms beyond the Afghan theatre of operations.** After the review was presented to Committee, SIRC staff was provided with documentation indicating that a previous Minister had been made aware of certain aspects of CSIS's firearms program. For example, SIRC was informed that "in or about 2011", the Minister was briefed on an "information-only basis" that the decision to arm CSIS officials was a matter of occupational health and safety, the accountability for which lay with the Director personally.<sup>62</sup>

The additional documentation provided to SIRC, which dates back approximately three years, does not consider the significant evolution of activities, nor does it address any of the legal and practical considerations raised in this report.<sup>63</sup>

After having carefully assessed this new information, SIRC remains of the opinion that the Service did not engage adequately with the Minister of Public Safety. Such a conclusion is based on the fact that the nature and scope of the firearms program has evolved beyond the unique legal and operational circumstances within Afghanistan. This has further led SIRC to question CSIS's legislative authority to arm employees outside the Afghan theatre of operations.

SIRC believes that many of the issues raised in this review go to the heart of ministerial accountability over CSIS. **SIRC therefore recommends that CSIS provide the Minister with written justification explaining under what legal authority CSIS officials are permitted to carry firearms outside of the unique legal context of Afghanistan. Moreover, as part of this Ministerial consultation, SIRC would expect that the Service provide a full explanation of how the arming of is consistent with CSIS's Policy Framework, namely that it detail how these activities are lawful and authorized, necessary, proportionate, and represent an effective and efficient use of public resources.**

Furthermore, the difficulties encountered in trying to find documentation pertaining to CSIS's interactions with the Minister on this issue raised an additional issue of concern. There is wide acceptance of the importance of adhering to robust information-management practices among Canadian government departments and agencies, especially with respect to decision-making. The Committee found it surprising, but also unacceptable, that CSIS had no record of a meeting between the CSIS Director and the

<sup>62</sup> CSIS Letter from DG/ER&L to SIRC Executive Director, Re: CSIS Operational Support and Its Use Overseas (SIRC Study – 2013-07), April 16, 2014. The information contained in this letter is based on the recollection of the Minister's assistant, which CSIS obtained after SIRC's review was presented to Committee.

<sup>63</sup> Memorandum to the Minister, CSIS Views on the Inspector General's 2010-2011 Certificate, CCM#10940, No Date, No Signature.

Minister during which an issue as important as firearms was discussed. **As such, SIRC recommends that CSIS take immediate and appropriate steps to impress the importance of maintaining records of discussions and decisions to ensure proper accountability.**

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## 6. CONCLUSION

What constitutes the appropriate functions of an intelligence agency is an old debate in Canada. The Royal Commission on Security of 1968, for example, called for “the establishment of a new civilian non-police agency to perform the function of a security service in Canada” rather than continuing to rely on the Royal Canadian Mounted Police (RCMP) to perform this activity.<sup>64</sup> Although the Government of the day did not act on this recommendation, then-Prime Minister Trudeau stated that the security service would be “increasingly separate in structure and civilian in nature”.<sup>65</sup> What the Prime Minister had attempted to achieve was a compromise: create a civilian security service similar to the one envisioned by the Royal Commission, albeit *within* an armed police culture. The eventual necessity of another Royal Commission (i.e. McDonald, 1981) and the creation of a separate civilian-only agency under the *CSIS Act* ended the debate on the merits of hybrid models for the next quarter century.

SIRC believes parallels can be drawn from the debates of the 1960s through 1980s to what is currently unfolding within CSIS today. Essentially, the Service is attempting to achieve a compromise by adopting a hybrid model which grafts military-styled processes on a civilian agency. Indeed, unlike whole of government approaches which share the burden of responsibilities, there are much more complex ramifications when an agency like CSIS chooses a more independent path. For this reason, the Committee believes that further consideration is required on the necessity and appropriateness of CSIS's decision to operate while armed within dangerous environments.

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<sup>64</sup> Referenced within Commission of Inquiry Concerning Certain Activities of the Royal Canadian Mounted Police, “Second Report, Volume 2: Freedom & Security Under the Law: Part VI – Chapter 1,” 1981, p.671.

<sup>65</sup> Referenced within Commission of Inquiry Concerning Certain Activities of the Royal Canadian Mounted Police, “Second Report, Volume 2: Freedom & Security Under the Law: Part VI – Chapter 1,” 1981, p.673.